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BEFORE THE
SURFACE TRANSPORTATION BOARD

E.I. DUPONT DE NEMOURS AND COMPANY Complainant, v. NORFOLK SOUTHERN RAILWAY COMPANY Defendant.	Docket No. NOR 42125

NORFOLK SOUTHERN RAILWAY COMPANY'S SECOND MOTION TO COMPEL

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Dated: October 31, 2011

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NORFOLK SOUTHERN RAILWAY COMPANY'S SECOND MOTION TO COMPEL

Defendant Norfolk Southern Railway Company ("NS") respectfully moves pursuant to 49 C.F.R. §1114.31(a) for an order to compel Complainant E.I. du Pont de Nemours and Company ("DuPont") to respond in full to NS Interrogatories 47 and 49 and NS Request for Production 22. The issue presented by this motion is a straightforward one. May a rate case litigant avoid producing unquestionably relevant information simply because that information is in the possession of its subsidiary? Specifically, Complainant DuPont has refused to produce information in the possession of Sentinel Transportation, LLC ("Sentinel") – a DuPont subsidiary that operates a private trucking fleet for DuPont and Sentinel's minority owner ConocoPhillips – because DuPont asserts that Sentinel is "a separate legal entity from DuPont." Exhibit B at 21 (DuPont's Objections and Responses to the Second Requests (served October 19, 2011)). But the issue is not whether Sentinel is legally "separate" from DuPont – the Board has repeatedly ordered discovery from corporate affiliates that are "separate legal entities." Rather, the issue is whether DuPont has the ability to obtain the requested information from Sentinel. The evidence shows that it does. DuPont has admitted in public SEC filings to being an 80%

owner of Sentinel, and the available evidence shows substantial coordination and overlap between DuPont and Sentinel. Indeed, DuPont {{

}} *See infra* at 7-9; Exhibit F at ¶ 18(a). Moreover, the information about the private trucking fleet that Sentinel maintains for DuPont is highly relevant to market dominance issues in this case. The Board should overrule DuPont's unjustified objection to producing its subsidiary's information.

I. BACKGROUND

On September 19, 2011, NS served DuPont with NS's Second Set of Interrogatories and Requests for Production of Documents ("Second Requests") (attached as Exhibit A).[1] Among other things, the Second Requests asked DuPont to provide information about its private truck fleet, which is operated by a DuPont subsidiary, Sentinel Transportation, LLC ("Sentinel"). Sentinel is a limited liability company incorporated under the laws of Delaware. Sentinel was formed in 1996 as a wholly-owned subsidiary of DuPont to operate DuPont's private trucking fleet, including the truck operations that DuPont had acquired when it purchased Conoco in the 1980s. *See* Exhibit C (Gregory S. Johnson, *Du Pont Combines Bulk Truck Fleet Operations*, JOURNAL OF COMMERCE (Feb. 29, 1996)). After DuPont spun off Conoco in 1999, it chose to continue operating Sentinel as a DuPont-Conoco joint venture that provides trucking services exclusively to DuPont and Conoco (now ConocoPhillips). *See* Exhibit D at 1 (National Private Truck Council, *Member Profile: Sentinel Transportation*). DuPont retained the lion's share of control over Sentinel; according to DuPont SEC filings, Sentinel is "a joint venture whose

[1] On August 25, 2011, the Board granted DuPont's Motion to Extend the Procedural Schedule and extended the discovery period until September 30, 2011. Both DuPont and NS served additional discovery requests during the extended discovery period. *See* DuPont Third Set of Discovery Requests (served Sept. 9, 2011); DuPont Fourth Set of Discovery Requests (served Sept. 29, 2011).

members are DuPont (80%) and Conoco (20%)." *See* Exhibit E at 4 (E.I. du Pont de Nemours & Co. Form 11-K Annual Report of Employee Stock Purchase, Savings and Similar Plans (filed June 27, 2011)).[2] Public reports indicate that Sentinel operates a fleet of over 400 tractors and approximately 1200 specialized trailers. *See* Exhibit D at 2.

Because information about DuPont's private trucking fleet is highly relevant to whether DuPont has effective trucking alternatives for some of the issue movements and because {{

}}. NS Interrogatory 47 asked for information about DuPont's control over Sentinel and the capacity of Sentinel trucks to carry the issue commodities.[3] NS Interrogatory 49 requested further information about the trucks in

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[2] *See also* Exhibit F at ¶¶ 5-6 {{ }}

[3] *See* Exhibit A at 5:

<u>NS Interrogatory 47</u>

Please provide the following information with respect to Sentinel Transportation, LLC ("Sentinel"):

a) The nature of DuPont's ownership interest (or other rights or interests) in Sentinel, including whether or not DuPont owns a majority or controlling interest in Sentinel;
b) All other entities with an ownership interest in Sentinel;
c) The total number of trucks owned, leased, and/or operated by Sentinel;
d) Separately for each Issue Commodity, the number of trucks owned, leased, and/or operated by Sentinel that could be used to transport that Issue Commodity;
e) To the extent not previously produced, all Sentinel truck shipments of the issue commodities between 2006 and the present (including both shipments for DuPont's account and shipments for the account of other entities): and
f) To the extent not previously produced, all Sentinel contracts and agreements relating to truck transportation of the issue commodities between 2008 and the present (including both shipments for DuPont's account and shipments for the account of other entities).

Sentinel's fleet.[4] NS also posed a companion request for production asking DuPont to produce any documents that it consulted or relied upon in answering NS's interrogatories.[5]

DuPont served its Responses to the Second Requests on October 19, 2011. DuPont objected to providing information about Sentinel on the theory that Sentinel was "a separate legal entity from DuPont" and therefore that Sentinel information was "not known to DuPont." Exhibit B at 21. DuPont further claimed that "resources available to Sentinel" were irrelevant because Sentinel was "a separate organization." *Id.*[6] Based on this objection, DuPont refused to produce responsive information on the total number of trucks owned by Sentinel or the capacity

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[4] *See id.* at 6:

<u>Interrogatory 49</u>

For each truck owned or leased by DuPont, Sentinel Transportation LLC, or any other Motor Carrier identified in response to Interrogatory 48, and for each of the calendar years 2008 to the present, please provide the following:

a) The owner or lessee of the truck;
b) The location(s) from which the truck is assigned;
c) Truck model or type;
d) Date of purchase or lease;
e) Original cost plus additions and betterments;
f) Description of financing vehicle (e.g., equipment trust);
g) Debt rate as a percent;
h) Finance terms (in years);
i) Annual depreciation;
j) Accrued depreciation;
k) If leased, whether capital or operating lease; and
l) All Issue Commodities that the truck could be used to transport.

[5] *See id.* at 8:

<u>Request for Production 22</u>

Produce all documents, data, or information identified or referenced in your responses to NS's Second Set of Interrogatories, and all documents or other information you reviewed, consulted, considered, or relied upon in developing or preparing those responses.

[6] DuPont's Response to Interrogatory 47 designated information about {{ }} as Highly Confidential under the January 11, 2011 Protective Order. There is nothing confidential about this information, since DuPont has said as much in its public SEC filings. *See* Exhibit E at 4. NS has only designated this information as Highly Confidential because DuPont so designated it, and by doing so NS does not concede that the designation was proper.

of those trucks to transport the issue commodities and refused to produce any information on Sentinel's truck movements for ConocoPhillips or its contracts with ConocoPhillips (information which is critical to understanding how much additional capacity Sentinel might have to transport the issue commodities for DuPont).[7] *See id.* After NS questioned the grounds for DuPont's objection, DuPont reiterated that Sentinel "is a separate legal entity" and produced the LLC agreement forming Sentinel, which DuPont claimed showed that {{ }} Exhibit H at 2 (J. Moreno Letter to M. Warren (Oct. 27, 2011).

II. THE BOARD SHOULD COMPEL DUPONT TO RESPOND TO DISCOVERY REQUESTS AS TO ITS SUBSIDIARY SENTINEL.

The general standard of review for motions to compel is a familiar one: "Parties may obtain discovery under this subpart regarding any matter, not privileged, which is relevant to the subject matter involved in a proceeding." 49 C.F.R. § 1114.21(a)(1); *see Seminole Electric Coop., Inc. v. CSX Transp., Inc.*, STB Docket No. NOR 42110, at 1-2 (served Feb. 17, 2009). If a party refuses to produce responsive, nonprivileged information, the Board will grant motions to compel production if the moving party can "demonstrate a real, practical need for the information" requested. *Coal Rate Guidelines, Nationwide*, 1 I.C.C.2d 520, 548 (1985).

The specific legal principle at issue in this case is also clear and well-settled. The Board has long recognized that discovery can properly reach a litigant's corporate affiliates. *See, e.g., Seminole*, STB Docket No. NOR 42110, at 2 (served Feb. 17, 2009) (railroad was required to

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[7] While DuPont's response to Interrogatory 47 is not a model of clarity, it appears to have agreed to respond to subparts (a) and (b), to have refused to produce any information to subparts (c) and (d), and to have refused to produce any information in response to subparts (e) and (f) not related to DuPont shipments and DuPont contracts. DuPont's response to Interrogatory 49 is similarly vague as to what it is or is not planning to produce, but it is clear that DuPont is refusing to produce any Sentinel information responsive to Interrogatory 49.

produce data from related company in part "[b]ecause they are corporate affiliates with the same parent company"); *PYCO Indus. Feeder Line Application – Lines of S. Plains Switching, Ltd.*, STB Fin. Docket No. 34890, at 2 (Oct. 5, 2006) (holding that feeder line applicant was required to respond to discovery requests for information regarding its parent company and its parent's other subsidiaries and affiliated companies); *Minnesota Power, Inc. v. Duluth, Missabe & Iron Range Ry. Co.*, 4 S.T.B. 64, 73 (1999) (holding that railroad was responsible for producing documents in the possession of its parent company and its parent's other subsidiaries).[8] The Board's focus in these cases was not on the particularities of the corporate relationships at issue,[9] but rather on whether the litigating party had the practical ability to obtain documents from its affiliate. *See, e.g.*, *Seminole*, STB Docket No. NOR 42110, at 2 (served Feb. 17, 2009) (noting that railroad defendant "likely has access" to affiliate's information). The Board's test for determining whether a litigant should produce information from a corporate affiliate mirrors that used by federal courts a party is required to produce information under its control, and a party will be deemed to "control" documents if it has "some legal right, authority *or* ability to obtain the requested documents on demand." *Camden Iron & Metal Inc. v. Marubeni Am. Corp.*, 138 F.R.D. 438, 442 (D.N.J. 1991) (emphasis in original).[10]

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[8] *See also Grand Rapids E. R.R., Inc.—Purchase, Lease & Operation Exemption—Rail Lines of Cent. Mich. R.R. Co.*, ICC Finance Docket No. 32297, 1994 WL 44234 at *4 n.2 (Feb. 16, 1994).

[9] It should be noted that in each of these cases the Board ordered that parties produce discovery from parents, subsidiaries, or affiliates that by definition were "separate legal entities" from the litigant itself.

[10] *See also Starlight Int'l, Inc. v. Herlihy*, 186 F.R.D. 626, 635 (D. Kan. 1999) (citing multiple cases for the same proposition which courts have "universally held"). While many cases dealing with a corporation's control over an affiliate's information arise in the context of requests for production and not interrogatories, there is no meaningful distinction between federal Rule 34's requirement that parties produce information in their "control" and Rule 33's requirement that parties answer interrogatories with information that is "available." *See Wilson v. Volkswagen of Am., Inc.*, 561 F.2d 494, 513 (4th Cir. 1977) (holding that "availability" in Rule 33 and "control" in Rule 34 are "used to express the same thought" and that "[t]he two Rules are equally inclusive

A. DuPont's "Separate Legal Entity" Argument is Meritless.

DuPont's position that it can avoid producing documents because Sentinel "is a separate legal entity" is unjustified. Exhibit B at 21. Every subsidiary or affiliate is a "separate legal entity" – the whole point of incorporation is to create a different legal entity. The issue here is not whether Sentinel Transportation, LLC is legally "separate" from E.I. du Pont de Nemours and Company in a narrow technical sense -- the issue is whether the intra-corporate relationship between Sentinel and DuPont indicates that DuPont has "some legal right, authority *or* ability to obtain" the requested information. *Camden Iron & Metal Inc.*, 138 F.R.D. at 442. As demonstrated below, DuPont has both the practical ability and legal right to obtain information from Sentinel.

In the first place, it should be clear what sort of "legal entity" Sentinel is: a DuPont subsidiary. DuPont has admitted publicly in SEC filings that it owns an 80% interest in Sentinel. *See* Exhibit E at 4. An 80% interest is more than sufficient to establish that DuPont has control over Sentinel and that Sentinel is a DuPont subsidiary.[11] Indeed, DuPont recognizes Sentinel as a subsidiary on its website and has listed it as a subsidiary in DuPont SEC filings. *See* Exhibit I at 3 (*Subsidiaries*, DUPONT.COM, http://www2.dupont.com/Our_Company/en_ID/subsidiaries (last visited Oct. 31, 2011)); Exhibit J at 4 (excerpts from DuPont Annual Report on Form 10-K (filed Feb. 28, 2006)).[12] While ConocoPhillips's partial ownership of Sentinel means that

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in their scope" (internal quotation marks omitted)); *Brunswick Corp. v. Suzuki Motor Co.*, 96 F.R.D. 684, 686 (E.D. Wisc. 1983) (holding that information in possession of parties' partially-owned subsidiaries was available to those parties for purposes of responding to interrogatories).

[11] *See* BLACK'S LAW DICTIONARY 1428 (6th ed. 1990) (defining "subsidiary corporation" as "One in which another corporation (*i.e.* parent corporation) owns at least a majority of the shares, and thus has control. Said of a company more than 50 percent of whose voting stock is owned by another.").

[12] More recent DuPont 10-Ks include a much shorter list of selected "certain subsidiaries" that does not include Sentinel. While it is not clear why DuPont decided to shorten the list of

Sentinel is not a wholly-owned DuPont subsidiary, DuPont plainly owns a controlling majority interest. Parties are regularly required to produce information in the possession of their partially-owned subsidiaries.[13]

Moreover, DuPont's actions belie its claimed lack of "control" over Sentinel. DuPont's website publicly touts Sentinel's achievements as its own. *See* Exhibit K ("DuPont Reduces Emissions and Fuel Usage through Sentinel Transportation"). {{

}} Several DuPont officers are also Sentinel officers. For example, DuPont's Director of Global Logistics is also Chairman of Sentinel Transportation, LLC.[14] Sentinel's former General Counsel simultaneously held a position with DuPont's legal department. *See* Exhibit N. And even Sentinel officers who are not holding dual positions with DuPont and Sentinel are often former DuPont employees. *See* Exhibit P at 5 (Mary Davis, "Sentinel Transportation Flourishes Under Close DuPont, Conoco Relationship," BULK TRANSPORTER (Apr. 1, 2000) ("Most of Sentinel's managers have been employed by DuPont or Conoco, or they have worked for Sentinel in conjunction with the two companies.")).

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subsidiaries in its more recent 10-Ks, {{

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[13] *See, e.g.*, *Kamatani v. Benq Corp.*, No. Civ. A. 2:03-CV-437, 2005 WL 2455825, at *6 (E.D. Tex. Oct. 6, 2005) (holding that party had control over documents of joint venture in which it had a "49% ownership interest"); *Brunswick*, 96 F.R.D. at 685-86 (information in possession of parties' "partially owned" subsidiaries was available to those parties for purposes of responding to interrogatories).

[14] *See* Exhibit L (Tim Byrd biography identifying him as "Director for DuPont Global Logistics and Chairman for a DuPont joint venture, Sentinel Transportation, LLC," *available at* http://www.dcenter.com/media/F_11_edCom_bios/TimByrd.pdf); Exhibit M (Tim Byrd LinkedIn profile listing current positions as Director –Global Logistics for DuPont and Chairman at Sentinel).

The interactions between DuPont and Sentinel do not end there. DuPont's SEC filings indicate that it administers certain retirement plans for Sentinel employees. *See* Exhibit E at 19 (DuPont SEC filing related to Thrift and Savings Plan for Employees of Sentinel Transportation, LLC; filing indicates that two largest plan assets are its interest in "the DuPont and Related Companies Defined Contribution Plan Master Trust" and "DuPont Company Stock"). {{

}} Indeed, Sentinel's website includes a DuPont stock ticker! *See* Exhibit O. There is no reason why DuPont's close corporate relationship with Sentinel would not allow it to obtain information from Sentinel upon request.

DuPont claims that {{

[15]{{

DuPont's claim that {{ }} provides a means to distinguish *Seminole Electric Cooperative, Inc. v. CSX Transp., Inc.*, STB Docket No. NOR 42110 (served Feb. 17, 2009) is thoroughly unconvincing. In that case the defendant CSX Transportation, Inc. ("CSXT") and the affiliate CSX Intermodal ("CSXI") were operated independently, and the Board did not hold otherwise. And to the extent that *Seminole* was distinct from the situation here, that distinction does not work in DuPont's favor. CSXT had no ownership interest in CSXI, which was an affiliate company whose only relationship with CSXT was that CSXT and CSXI shared the same parent company. Here, DuPont owns 80% of Sentinel, and as Sentinel's parent company it plainly has "access to the information requested." *Seminole*, STB Docket No. NOR 42110, at 2 (served Feb. 17, 2009). Like the Board found in *Seminole*, DuPont "cannot use [Sentinel's] status as a separate corporate entity as a shield from discovery requests." *Id.*

{{

}} And the

[15] *See Brunswick Corp. v. Suzuki Motor Co.*, 96 F.R.D. 684, 686 (E.D. Wis. 1983) (finding that subsidiaries' information was available for discovery purposes even though "the defendants strenuously contend that their U.S. subsidiaries are separate, independent entities, having individual control over day-to-day operations"); *Perini America, Inc. v. Paper Converting Machine Co.*, 559 F. Supp. 552, 553 (E.D. Wis. 1983) (finding that documents of affiliate were under control of plaintiff corporation even though affiliate "is not under the 'control' of [the plaintiff] in the corporate hierarchy for all purposes"); *cf. Afros S.p.A. v. Krauss-Maffei Corp.*, 113 F.R.D. 127, 129 ("actual managerial power" not necessary to find "control" for discovery purposes).

Delaware Limited Liability Company Act gives DuPont a statutory right to obtain information from Sentinel. As an 80% owner of the Sentinel LLC,[16] DuPont has "a right [as an LLC member] . . . to obtain from the limited liability company from time to time upon reasonable demand for any purpose reasonably related to the member's interest as a member of the limited liability company" information including "[t]rue and full information regarding the status of the business and financial condition of the limited liability company" and "other information regarding the affairs of the limited liability company as is just and reasonable." Del. Code Ann. tit. 6, § 18-305. The fact that DuPont has a legal right to obtain "[t]rue and full" Sentinel information under the Delaware Limited Liability Company Act is further evidence that it has the ability to obtain Sentinel information upon request.

It is telling that neither DuPont's initial objections to NS Interrogatories 47 and 49 nor its attempt to defend those objections in its October 27 letter represented that DuPont could not obtain the requested information from Sentinel or that Sentinel had refused a DuPont request to provide responsive information. And it is hardly credible that a DuPont subsidiary would refuse a request by its 80% owner to provide information that Delaware law requires Sentinel to provide to any LLC member. There is simply no question that DuPont has the ability to fully answer Interrogatories 47 and 49. The fact that it has elected to resist discovery rather than ask its subsidiary to provide responsive information is not a legitimate objection to discovery.

Finally, it should not be overlooked that throughout this litigation DuPont has demanded that NS produce information from NS affiliate companies and that NS has done so. For example, NS has responded to discovery requests about NS affiliate companies like Triple Crown Services

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and Thoroughbred Direct Intermodal Services and has produced available responsive and nonprivileged information from those affiliates. Indeed, NS has produced a substantial amount of information to DuPont that NS obtained from Consolidated Rail Corporation ("Conrail"). NS Corporation and CSX Corporation jointly own Conrail, and Conrail plainly is not under NS's sole control. But in an effort to fully respond to DuPont's discovery requests, NS asked Conrail for access to certain responsive information and documents, and NS produced that information and documents to DuPont. The fact that DuPont has benefitted from NS's diligent efforts to comply with Board precedent by producing affiliate information that is reasonably within NS's control is further reason why DuPont should be compelled to produce Sentinel information.

B. Information About the Sentinel Trucking Fleet Is Relevant to Qualitative Market Dominance.

The Sentinel information that DuPont has refused to produce is relevant to the qualitative market dominance inquiry and specifically to DuPont's ability to use its private Sentinel trucking fleet as alternative transportation for the Issue Movements. This relevant information should be produced.

The Board's jurisdiction to consider a rate reasonableness complaint is limited to instances where there is "an absence of effective competition from other rail carriers or modes of transportation for the transportation to which a rate applies." 49 U.S.C. § 10707(a). In recent cases the Board has recognized the critical importance of the qualitative market dominance threshold and has carefully examined whether or not complainants have "feasible transportation alternatives that could be used for the issue traffic." *Total Petrochemicals USA, Inc. v. CSX Transp., Inc.*, S.T.B. Docket No. NOR 42121, at 4 (served Apr. 5, 2011) (granting motion to expedite consideration of market dominance).

One critical issue in this case will be whether DuPont has access to alternative trucking options that could provide effective competition to NS rail service over some of the issue lanes. Data that DuPont has produced in discovery indicates that it has shipped {{ }} of truckloads of the issue commodities over the last five years and that {{ }} of those truck shipments have been in Sentinel equipment. DuPont's ability to use the Sentinel trucking fleet is highly relevant to whether effective competition exists for the issue movements. Shippers with access to their own trucking fleets naturally have more opportunities to obtain competitive trucking rates and guaranteed truck capacity (as well as increased negotiating leverage when dealing with other truck providers).[17] Here, DuPont's ownership of Sentinel and access to the specialized Sentinel truck fleet significantly enhances DuPont's ability to obtain competitive trucking for the issue commodities. NS Interrogatories 47 and 49 are narrowly targeted to specific information necessary to evaluate Sentinel's capacity to fulfill DuPont's trucking needs, including the total size of the Sentinel trucking fleet (NS Interrogatory 47(c)); the types of trucks in the Sentinel fleet (NS Interrogatories 47(d) & 49); the ownership and financing of those trucks (NS Interrogatory 49); the commodities that Sentinel trucks could carry (NS Interrogatories 47(d) & 49(l)); and the obligations of Sentinel to transport traffic for Conoco or customers other than DuPont (NS Interrogatories 47(e) & (f)). This is relevant information, and DuPont is required to produce it.

It may be that DuPont intends to argue that its relationship with Sentinel is an arms-length one and that Sentinel would not make concessions to DuPont on rates or truck capacity.

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[17] Indeed, shippers in other rate cases have argued that a lack of truck capacity or an inability to obtain competitive trucking rates are factors that contribute to a carrier's market dominance. *See* Opening Market Dominance Evidence of M&G Polymers USA, LLC at II-B-46 through II-B-51, *M&G Polymers USA, LLC v. CSX Transp., Inc.*, STB Docket No. NOR 42123 (filed June 6, 2011). The Sentinel information NS has requested would be highly relevant to rebutting any such argument.

That argument is not convincing, but in any event it would be beside the point. This is discovery. If DuPont thinks that its ownership of Sentinel should not be considered when evaluating DuPont's alternative transportation options, it can make that argument in its Opening Evidence. What it cannot do is refuse to produce information that is both available to it and relevant to a critical jurisdictional issue in this case.

III. CONCLUSION

For the foregoing reasons, NS respectfully requests that the Board order DuPont to provide complete responses to NS Interrogatories 47 and 49 and NS Request for Production 22 that include information in the possession of Sentinel.

Respectfully submitted,

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Counsel to Norfolk Southern Railway Company

Dated: October 31, 2011

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of October, 2011, I caused a copy of Norfolk Southern Railway Company's foregoing Second Motion to Compel to be served on the following parties by first class mail, postage prepaid or more expeditious method of delivery:

Jeffrey O. Moreno
Sandra L. Brown
Jason R. Tutrone
Thompson Hine LLP
1920 N Street, NW, Suite 800
Washington, DC 20036

Eva Mozena Brandon

EXHIBIT A

BEFORE THE
SURFACE TRANSPORTATION BOARD

E.I. DUPONT DE NEMOURS & COMPANY Complainant v. NORFOLK SOUTHERN RAILWAY COMPANY Defendant	Docket No. NOR 42125

DEFENDANT'S SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

Pursuant to 49 C.F.R. Part 1114. Defendant Norfolk Southern Railway Company ("NS") hereby submits its Second Set of Interrogatories and Requests for Production of Documents ("Discovery Requests") to Complainant E.I. DuPont de Nemours & Company ("DuPont"). DuPont's answers or responses to these Discovery Requests (including any objections) should be delivered to undersigned counsel at the offices of Sidley Austin LLP, 1501 K Street. N.W., Washington. D.C. 20005. Responses to the enclosed Discovery Requests should be served on NS within 30 days of service of these requests. unless otherwise agreed by the parties.

NS is prepared to cooperate with DuPont to facilitate the expeditious production of documents and information responsive to these Discovery Requests with the minimum practicable burden. NS requests that DuPont promptly contact NS's counsel should there be any questions concerning the meaning or scope of any of the Discovery Requests, the nature of the information and documents responsive to them, or the procedure for producing responsive material.

Exhibit A

NS incorporates the Definitions and Instructions set forth in its First Set of Interrogatories and Requests for Production of Documents (served December 14, 2010), and those Definitions and Instructions apply to the Interrogatories set forth below.

INTERROGATORIES

Interrogatory 37. Identify and describe with specificity all data regarding barge traffic to and from any Issue Facility since January 1, 2006, including without limitation:

a) number of barges;
b) loaded barge weights;
c) origins and destinations of barge shipments;
d) volumes shipped to each such origin and destination; and
e) commodities, products or freight delivered or shipped.

This interrogatory encompasses information for all barge traffic to and from any Issue Facility and is not limited to information for barge shipments DuPont deems to be under its "control."

Interrogatory 38. For each Issue Commodity that has been transported by barge or vessel to or from a DuPont facility since 2006, please explain in detail the process, procedures, and protocols for loading and unloading the Issue Commodity into or out of barges or vessels. If the loading process has changed since 2006, please describe the reasons for the change, and the loading procedures before and after the change.

Interrogatory 39. For each Issue Commodity that has been transported by barge or vessel transportation to or from a DuPont facility since 2006, please identify and describe the equipment used for loading and unloading the Issue Commodity into or out of barges or vessels. If the equipment used in the loading and unloading process has changed since 2006, please describe the reasons for the change and the equipment used before and after the change.

Interrogatory 40. For each Issue Commodity that has been transported by truck transportation to or from a DuPont facility since 2006, please identify and describe the equipment used for loading and unloading the Issue Commodities into and out of trucks at DuPont facilities and at DuPont customer facilities. If the equipment used in the loading and unloading process has changed since 2006, please describe the reasons for the change and the equipment used before and after the change.

Interrogatory 41. Please identify and describe with specificity all studies, analyses, communications, and documents relating to amounts of time required and/or experienced to load and unload the Issue Commodities into or out of trucks. If no such studies or analyses exist for a particular commodity, please explain and quantify the amount of time required to load and unload trucks with that commodity.

Interrogatory 42. Please identify and describe with specificity all studies, analyses, communications, and documents relating to amounts of time required and/or experienced to load and unload the Issue Commodities into or out of barges or vessels. If no such studies or analyses exist for a particular commodity, please explain and quantify the amount of time required to load and unload barges or vessels with that commodity.

Interrogatory 43. For each of the Issue Commodities, please state whether DuPont contends that truck transportation of that Issue Commodity is infeasible, impractical, or unwarranted because of (i) the physical characteristics of that commodity, (ii) the hazardous nature of the commodity; and/or (iii) concerns that truck transportation would adversely affect product quality. If DuPont contends that truck transportation of any Issue Commodity is infeasible, impractical, or unwarranted for any of these reasons, describe the particular commodity characteristics or product quality concerns that DuPont believes support that contention.

Interrogatory 44. For each of the Issue Commodities, please state whether DuPont contends that barge or vessel transportation of that Issue Commodity is infeasible, impractical, or unwarranted because of (i) the physical characteristics of that commodity, (ii) the hazardous nature of the commodity; and/or (iii) concerns that barge or vessel transportation would adversely affect product quality. If DuPont contends that barge or vessel transportation of any Issue Commodity is infeasible, impractical, or unwarranted for any of these reasons, describe the particular commodity characteristics or product quality concerns that DuPont believes support that contention.

Interrogatory 45. For each of the Issue Commodities, please state whether DuPont contends that transloading of that Issue Commodity (including transloading between trucks and railcars, barges and railcars, and vice versa) is infeasible, impractical, or unwarranted because of (i) the physical characteristics of that commodity, (ii) the hazardous nature of the commodity; and/or (iii) concerns that transloading would adversely affect product quality. If DuPont contends that transloading of any Issue Commodity is infeasible, impractical, or unwarranted for any of these reasons, describe the particular commodity characteristics or product quality concerns that DuPont believes support that contention.

Interrogatory 46. For each of the Issue Commodities, please identify the types of trucks suitable for truck transportation of that commodity. If you contend that truck transportation of any Issue Commodity requires the use of specialized trucks (*e.g.*, temperature-controlled trucks), describe the basis for that contention in detail.

Interrogatory 47. Please provide the following information with respect to Sentinel Transportation, LLC ("Sentinel"):

a) The nature of DuPont's ownership interest (or other rights or interests) in Sentinel, including whether or not DuPont owns a majority or controlling interest in Sentinel;

b) All other entities with an ownership interest in Sentinel;

c) The total number of trucks owned, leased, and/or operated by Sentinel;

d) Separately for each Issue Commodity, the number of trucks owned, leased, and or operated by Sentinel that could be used to transport that Issue Commodity;

e) To the extent not previously produced, all Sentinel truck shipments of the issue commodities between 2006 and the present (including both shipments for DuPont's account and shipments for the account of other entities); and

f) To the extent not previously produced, all Sentinel contracts and agreements relating to truck transportation of the issue commodities between 2008 and the present (including both shipments for DuPont's account and shipments for the account of other entities).

Interrogatory 48. If DuPont has an ownership interest in any other corporation, partnership, or other entity that owns or operates trucks that could be used to transport one or more of the Issue Commodities between any points (hereafter, "Motor Carrier"), please provide the following:

a) The name of the Motor Carrier;

b) The nature of DuPont's ownership interest in the Motor Carrier, including whether or not DuPont owns a majority or controlling interest in the Motor Carrier;

c) All other entities with an ownership interest in the Motor Carrier;

d) The total number of trucks owned, leased, and/or operated by the Motor Carrier;

e) Separately for each Issue Commodity, the number of trucks owned, leased, and/or operated by the Motor Carrier that could be used to transport that Issue Commodity;

f) To the extent not previously produced, all truck shipments by the Motor Carrier of the issue commodities between 2006 and the present (including both shipments for DuPont's account and shipments for the account of other entities); and

g) To the extent not previously produced, all contracts and agreements relating to truck transportation of the issue commodities by the Motor Carrier between 2008 and the present (including both shipments for DuPont's account and shipments for the account of other entities).

Interrogatory 49. For each truck owned or leased by DuPont, Sentinel Transportation LLC, or any other Motor Carrier identified in response to Interrogatory 48, and for each of the calendar years 2008 to the present, please provide the following:

a) The owner or lessee of the truck;
b) The location(s) from which the truck is assigned;
c) Truck model or type;
d) Date of purchase or lease;
e) Original cost plus additions and betterments;
f) Description of financing vehicle (e.g., equipment trust);
g) Debt rate as a percent;
h) Finance terms (in years);
i) Annual depreciation;
j) Accrued depreciation;
k) If leased, whether capital or operating lease; and
l) All Issue Commodities that the truck could be used to transport.

Interrogatory 50. If DuPont has an ownership interest (or other rights or interests) in any corporation, partnership, or other entity that owns, leases, or operates barges or vessels that could be used to transport one or more of the Issue Commodities between any points (hereafter, "Water Carrier"), please identify the following:

a) The name of the Water Carrier;
b) The nature of DuPont's ownership interest in the Water Carrier, including whether or not DuPont owns a majority or controlling interest in the Water Carrier;
c) All other entities with an ownership interest in the Water Carrier;
d) The total number of barges and/or vessels owned, leased, and/or operated by the Water Carrier;

e) Separately for each Issue Commodity, the number of barges and/or vessels owned, leased, and/or operated by the Water Carrier that could be used to transport that Issue Commodity;

f) To the extent not previously produced, all barge and/or vessel shipments by the Water Carrier of the issue commodities between 2006 and the present (including both shipments for DuPont's account and shipments for the account of other entities); and

g) To the extent not previously produced, all contracts and agreements relating to barge and/or vessel transportation of the issue commodities by the Water Carrier between 2008 and the present (including both shipments for DuPont's account and shipments for the account of other entities).

Interrogatory 51. For each barge or vessel owned or leased by DuPont or any Water Carrier identified in response to Interrogatory 50, and for each of the calendar years 2008 to the present, please provide the following:

a) The owner or lessee of the barge or vessel;

b) The location(s) from which the barge or vessel is assigned;

c) Barge or vessel model or type;

d) Date of purchase or lease;

e) Original cost plus additions and betterments;

f) Description of financing vehicle (e.g., equipment trust);

g) Debt rate as a percent;

h) Finance terms (in years);

i) Annual depreciation;

j) Accrued depreciation;

k) If leased, whether capital or operating lease; and

l) All Issue Commodities that the barge or vessel could be used to transport.

Interrogatory 52. Please identify and describe with specificity all studies, analyses, Forecasts, communications, and documents related to (i) personnel costs; (ii) rail car costs; (iii) storage costs; (iv) inventory costs; and/or (v) any other costs associated with use of a particular transportation mode for any and all of the Issue Commodities.

REQUESTS FOR PRODUCTION

Request for Production 22. Produce all documents, data, or information identified or referenced in your responses to NS's Second Set of Interrogatories, and all documents or other information you reviewed, consulted, considered, or relied upon in developing or preparing those responses.

Request for Production 23. Produce all documents related to studies, projects, and capital expenses to enhance truck loading capacity at the Issue Facilities, including but not limited to the studies referenced in "F Unit PV Hopper Truck Loading Options Project Update," DD000280—0300.

Request for Production 24. Produce any photographs, videos, site plans, or schematics for barge docks, barge slips, and facilities necessary to load or unload barges at either (i) Issue Facilities with water access (including but not limited to the DuPont facilities at Lemoyne, AL; Delisle, MS; Pascagoula, MS; Loudon, TN; Dowling, TX; and Belle, WV); or (ii) facilities of DuPont customers who ship or receive one or more of the Issue Movements (including but not limited to the Olin facility at McIntosh, AL and the Stolthaven facility at Braithwaite, LA).

Request for Production 25. For all non-DuPont entities who are consignees, consignors, or ultimate originators or recipients of any of the Issue Shipments ("Issue Shipper/Receiver"), produce all documents, including analyses, Forecasts, or statements in your possession, custody or control (whether created by you, the Issue Shipper/Receiver, or another entity), relating to (i) future shipments of the Issue Commodities to or from that Issue Shipper/Receiver; (ii) that Issue Shipper/Receiver's future production or consumption of the Issue Commodities; and/or (iii) that Issue Shipper/Receiver's intentions regarding future production, consumption, purchases, sales, and/or transportation of the Issue Commodities.

Respectfully submitted,

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Counsel to Norfolk Southern Railway Company

Dated: September 19, 2011

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of September, 2011, I caused the foregoing Norfolk Southern Railway Company's Second Set of Interrogatories and Requests for Production to be served by first class mail, postage prepaid or more expeditious method of delivery on the following counsel for Complainant E.I. du Pont de Nemours and Company:

Jeffrey O. Moreno
Sandra L. Brown
Jason D. Tutrone
Thompson Hine LLP
1920 N Street, N.W., Suite 800
Washington, DC 20036

Eva Mozena Brandon

EXHIBIT B

BEFORE THE
SURFACE TRANSPORTATION BOARD

E.I. DUPONT DE NEMOURS AND COMPANY, Complainant, v. NORFOLK SOUTHERN RAILWAY COMPANY Defendant.	Docket No. NOR 42125

COMPLAINANT'S OBJECTIONS AND RESPONSES TO DEFENDANT'S SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS[1]

Complainant, E.I. du Pont de Nemours and Company ("DuPont"), hereby submits, to Defendant Norfolk Southern Railway Company ("Defendant" or "NS"), DuPont's Objections and Responses to Defendant's Second Set of Interrogatories and Requests for Production of Documents ("Discovery Requests"). DuPont's responses to the Discovery Requests are based upon information presently known. Because DuPont continues to investigate the facts and information relating to the issues in this case, DuPont reserves the right to modify and/or supplement any of its responses as the existence of additional responsive information becomes known. To the extent that DuPont states herein that responsive documents have already been produced, DuPont is willing to assist NS in locating those documents.

The General Objections, Objections to Definitions, and Objections to Instructions that DuPont set forth in its Objections and Responses to Defendant's First Set of Interrogatories and Requests for Production of Documents, served February 2, 2011, are incorporated herein and shall apply to Defendant's Second Set of Discovery Requests.

[1] Material enclosed in double brackets—i.e., [[ ]]—is Highly Confidential subject to the Board's protective order entered in this proceeding.

INTERROGATORIES

Interrogatory 37.

Identify and describe with specificity all data regarding barge traffic to and from any Issue Facility since January 1, 2006, including without limitation:

a) number of barges;
b) loaded barge weights;
c) origins and destinations of barge shipments;
d) volumes shipped to each such origin and destination; and
e) commodities, products or freight delivered or shipped.

This interrogatory encompasses information for all barge traffic to and from any Issue Facility and is not limited to information for barge shipments DuPont deems to be under its "control."

Response

DuPont objects to this Interrogatory to the extent it seeks information which is irrelevant to the issue of market dominance or to the rate reasonableness standards of thc Board as described in the *Coal Rate Guidelines, Nationwide*, Ex Parte No. 347 (Sub-No. 1), 1 I.C.C.2d 520 (1985), as revised in later ICC and Board decisions. DuPont objects to this Interrogatory as overbroad, unduly burdensome, and irrelevant because it is not limited to the Issue Commodities. DuPont objects to this interrogatory as vague, ambiguous, overbroad, and unduly burdensome in its use of "all data," which encompasses every conceivable piece of information including those bearing little import to the proceeding. Attempting to compile all data regarding the delivery of supplies and Issue Commodities would subject DuPont to a burden that is grossly out of proportion to the value of the information sought. DuPont objects to this Interrogatory to the extent that it seeks data that is not within DuPont's possession, custody, or control. DuPont objects to this Interrogatory reference to barge shipments under DuPont's "control" as vague and ambiguous and interprets it to mean barge shipments for which DuPont paid the freight. As explained in the letter from Jason D. Tutrone to Matthcw Warren of October 7, 2011, DuPont has produced data concerning shipments for which it does pay the freight, but cannot guarantee the accuracy of such data. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that it has already produced, subject to its previously raised objections, the following responsive documents from which the answer to this Interrogatory can be derived or ascertained. *See* 49 C.F.R. § 1114.26.

- "Barge Shipment Data 2006-2010.xls" on DD-HC-DVD-08.
- "Materials Received NEXUS.xls" on DD-HC-DVD-10.
- "Materials Received SAP.xls" on DD-HC-DVD-10 (DuPont provided an updated file on DD-HC-DVD-11).
- "Materials Received Washington Works.xls" on DD-HC-DVD-11.
- "NS Data 2008_v2.xls" on DD-HC-DVD-11.
- "NS Data 2009_v2.xls" on DD-HC-DVD-11.
- "NS Data 2010_v2.xls" on DD-HC-DVD-11.

As stated in the letter from Jason D. Tutrone to Matthew J. Warren of October 7, 2011, DuPont is continuing its follow up related to certain data.

Interrogatory 38.

For each Issue Commodity that has been transported by barge or vessel to or from a DuPont facility since 2006, please explain in detail the process, procedures, and protocols for loading and unloading the Issue Commodity into or out of barges or vessels. If the loading process has changed since 2006, please describe the reasons for the change, and the loading procedures before and after the change.

Response.

DuPont objects to this Interrogatory as overbroad, unduly burdensome, and irrelevant because it is not limited to the process, procedures, and protocols for loading and unloading Issue Commodities into or out of barges or vessels at DuPont Issue Facilities. DuPont objects to this Interrogatory as overbroad, unduly burdensome, and irrelevant to the extent it demands that

DuPont ascertain and describe any reasons for changes to its loading process since 2006. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that, to the extent DuPont has not already done so, it will produce or make available for inspection business records or other documents from which the answer to this interrogatory can be derived or ascertained. *See* 49 C.F.R. § 1114.26. Further, DuPont has already produced, subject to its objections, the following:

- Aniline Barge Loading and Unloading Procedures at Bates numbers 0006638-58 and 0010698-718.
- Considerations for Neutralizing Sulfuric Acid in Barges at Bates numbers 0004881-912.
- Spent Sulfuric Acid Loading Process at Bates numbers 0005070-165.
- Spent Sulfuric Acid Handling Pamphlet at Bates numbers 0005166-97.
- Procedures for Loading Sulfuric Acid Barges at Bates numbers 0006439-47.
- Procedures for Unloading Spent Acid Barges at Bates numbers 0006475-82.

Interrogatory 39.

> For each Issue Commodity that has been transported by barge or vessel transportation to or from a DuPont facility since 2006, please identify and describe the equipment used for loading and unloading the Issuc Commodity into or out of barges or vessels. If the equipment used in the loading and unloading process has changed since 2006, please describe the reasons for the change and the equipment used before and after the change.

Response.

DuPont objects to this Interrogatory as overbroad, unduly burdensome, and irrelevant because it is not limited to the equipment used for loading and unloading Issue Commodities into or out of barges or vessels at DuPont Issue Facilities served by NS. DuPont objects to this Interrogatory as overbroad, vague, and ambiguous to the extent that it is not limited to equipment used solely for the purpose of loading and unloading barges. DuPont objects to this Interrogatory as overbroad insofar as it requests information about equipment not in the possession, custody, or control of DuPont and that DuPont may not know exists. DuPont objects to this Interrogatory as overbroad, unduly burdensome, and irrelevant to the extent it demands that DuPont ascertain and describe any reasons for changes in the equipment used for loading and unloading and the equipment used before and after such changes. DuPont objects to the use of "equipment" in this interrogatory as vague and ambiguous because it is subject to multiple definitions. DuPont objects to this Interrogatory insofar as it is duplicative of other NS discovery requests. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that, to the extent DuPont has not already done so, it will produce or make available for inspection business records or other documents from which the answer to this Interrogatory can be derived or ascertained, or DuPont will provide a supplemental response to the extent that answer cannot be derived or ascertained from business records. *See* 49 C.F.R. § 1114.26. In addition, DuPont responds that the documents that DuPont listed in DuPont's response to Interrogatory 38 as having been produced identify equipment used for loading and unloading the Issue Commodities into barges.

Interrogatory 40.

For each Issue Commodity that has been transported by truck transportation to or from a DuPont facility since 2006, please identify and describe the equipment used for loading and unloading the Issue Commodities into and out of trucks at DuPont facilities and at DuPont customer facilities. If the equipment used in the loading and unloading process has changed since 2006, please describe the reasons for the change and the equipment used before and after the change.

Response.

DuPont objects to this Interrogatory as overbroad, unduly burdensome, and irrelevant because it is not limited to the equipment used for loading and unloading Issue Commodities into or out of trucks at DuPont Issue Facilities served by NS. DuPont objects to this Interrogatory as overbroad, vague, and ambiguous to the extent that it is not limited to equipment used solely for the purpose of loading and unloading trucks. DuPont objects to this Interrogatory as overbroad insofar as it requests information about equipment not in the possession, custody, or control of DuPont and that DuPont may not know exists. DuPont objects to this Interrogatory insofar as it is duplicative of other NS discovery requests. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that, to the extent DuPont has not already done so, it will produce or make available for inspection business records or other documents from which the answer to this Interrogatory can be derived or ascertained. *See* 49 C.F.R. § 1114.26. DuPont has already produced the following documents which may identify loading and unloading equipment:

COMMODITY	Bates Number Start	Bates Number End
ACID FUMING SULFURIC	6389	6395
ACID FUMING SULFURIC	6396	6408
ACID FUMING SULFURIC	6437	6438
ACID FUMING SULFURIC; ACID SULFURIC	6375	6388
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	6425	6427
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	6433	6434
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7257	7270
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7271	7278
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7279	7291
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7292	7294
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7295	7296
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7297	7307
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7308	7322
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7323	7330

COMMODITY	Bates Number Start	Bates Number End
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7331	7339
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7340	7348
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7349	7354
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7355	7355
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT	7356	7358
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	4881	4912
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	4913	4948
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	4949	5069
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	5070	5165
ACID FUMING SULFURIC; ACID SULFURIC, ACID SULFURIC SPENT, SULFUR TRIOXIDE	5166	5197
ACID FUMING SULFURIC; ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	6436	6436
ACID FUMING SULFURIC; ACID SULFURIC; SULFUR TRIOXIDE	4742	4748
ACID FUMING SULFURIC; ACID SULFURIC; SULFUR TRIOXIDE	4749	4763
ACID FUMING SULFURIC; ACID SULFURIC; SULFUR TRIOXIDE	4764	4769
ACID FUMING SULFURIC; ACID SULFURIC: SULFUR TRIOXIDE	4770	4779
ACID FUMING SULFURIC; ACID SULFURIC; SULFUR TRIOXIDE	4780	4786
ACID FUMING SULFURIC; ACID SULFURIC; SULFUR TRIOXIDE	4787	4793
ACID FUMING SULFURIC; ACID SULFURIC, SULFUR TRIOXIDE	4794	4805
ACID FUMING SULFURIC; ACID SULFURIC; SULFUR TRIOXIDE	4806	4812
ACID FUMING SULFURIC; ACID SULFURIC, SULFUR TRIOXIDE	4813	4819
ACID FUMING SULFURIC; ACID SULFURIC; SULFUR TRIOXIDE	4820	4827
ACID FUMING SULFURIC; ACID SULFURIC: SULFUR TRIOXIDE	4828	4836
ACID FUMING SULFURIC; ACID SULFURIC. SULFUR TRIOXIDE	4837	4841

COMMODITY	Bates Number Start	Bates Number End
ACID FUMING SULFURIC; ACID SULFURIC; SULFUR TRIOXIDE	4842	4850
ACID FUMING SULFURIC; ACID SULFURIC; SULFUR TRIOXIDE	4851	4857
ACID GLYCOLIC	5919	5920
ACID GLYCOLIC	5921	5926
ACID GLYCOLIC	5927	5932
ACID MURIATIC	7444	7489
ACID MURIATIC	7490	7535
ACID SULFURIC	4689	4718
ACID SULFURIC	6418	6424
ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	6439	6447
ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	6448	6452
ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	6453	6469
ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	6470	6471
ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	6472	6473
ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	6474	6474
ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	6475	6482
ACID SULFURIC; ACID SULFURIC SPENT; SULFUR TRIOXIDE	6483	6489
CHLORINE	6317	6332
CHLORINE	6525	6531
CHLORINE	6532	6547
CHLORINE	6548	6555
CHLORINE	6605	6607
CHLORINE	6098	6104
CHLORINE; COKE PETROLEUM CA	6333	6338
CHLORINE; COKE PETROLEUM CA	6339	6344
CHLORINE; COKE PETROLEUM CA	6345	6358
CHLORINE; SODIUM CAUSTIC	6608	6609
COKE PETROLEUM CA	6302	6316
DIFLUOROETHANE	5584	5594
DIFLUOROETHANE	5595	5595
DIFLUOROETHANE	5596	5596
DIFLUOROETHANE	5597	5599
DIFLUOROETHANE	5600	5600

COMMODITY	Bates Number Start	Bates Number End
DIFLUOROETHANE	5601	5603
DIFLUOROETHANE	5604	5605
DIFLUOROETHANE	5606	5607
DIFLUOROETHANE	5608	5611
DIFLUOROETHANE	5612	5615
DIFLUOROETHANE	5616	5616
DIFLUOROETHANE	5617	5618
DIFLUOROETHANE	5619	5621
DIFLUOROETHANE	5622	5622
DIFLUOROETHANE	5623	5630
DIFLUOROETHANE	5631	5631
DIFLUOROETHANE	5632	5632
DIFLUOROETHANE	5633	5634
DIFLUOROETHANE	5635	5635
DIFLUOROETHANE	5636	5636
DIFLUOROETHANE	5637	5637
DIFLUOROETHANE	5638	5639
DIFLUOROETHANE	5640	5641
DIFLUOROETHANE	5642	5642
DIFLUOROETHANE	5643	5643
DIFLUOROETHANE	5644	5644
DIFLUOROETHANE	5645	5645
DIFLUOROETHANE	5646	5649
DIFLUOROETHANE	5650	5652
DIFLUOROETHANE	5653	5653
DIFLUOROETHANE	5654	5654
DIFLUOROETHANE	5655	5658
DIFLUOROETHANE	5659	5659
DIFLUOROETHANE	5660	5663
DIFLUOROETHANE	5664	5667
DIMETHYL ETHER	5933	5940
DIMETHYL ETHER	5941	5950
DIMETHYL ETHER	5951	5959
DIMETHYL ETHER	5960	5965
DIMETHYL ETHER; DIMETHYL SULFATE; DIMETHYLAMINE ANHYDROUS; MONOMETHYL FORMAMIDE	6054	6056
DIMETHYL FORMAMIDE	6057	6097

COMMODITY	Bates Number Start	Bates Number End
DIMETHYL SULFATE	5966	5977
DIMETHYL SULFATE	5978	5986
DIMETHYL SULFATE	5987	5997
DIMETHYL SULFATE	5998	6007
DIMETHYL SULFATE	6008	6017
DIMETHYL SULFATE	6018	6053
DIMETHYLAMINE ANHYDROUS; DIMETHYLAMINE AQUEOUS	6179	6210
DIMETHYLAMINE ANHYDROUS; DIMETHYLAMINE AQUEOUS	6211	6218
DIMETHYLAMINE ANHYDROUS; DIMETHYLAMINE AQUEOUS	6219	6227
DIMETHYLAMINE ANHYDROUS; DIMETHYLAMINE AQUEOUS	6228	6234
DIMETHYLAMINE ANHYDROUS; DIMETHYLAMINE AQUEOUS	6235	6248
DIMETHYLAMINE ANHYDROUS; DIMETHYLAMINE AQUEOUS	6249	6258
DIMETHYLAMINE ANHYDROUS; DIMETHYLAMINE AQUEOUS	6259	6268
DIMETHYLAMINE ANHYDROUS; DIMETHYLAMINE AQUEOUS	6269	6274
DIMETHYLAMINE ANHYDROUS; DIMETHYLAMINE AQUEOUS	6275	6280
DIMETHYLAMINE ANHYDROUS; DIMETHYLAMINE AQUEOUS	6281	6288
DIMETHYLAMINE ANHYDROUS; DIMETHYLAMINE AQUEOUS	6289	6291
DIMETHYLAMINE AQUEOUS	6105	6110
DIMETHYLAMINE AQUEOUS	6111	6117
DIMETHYLAMINE AQUEOUS	6118	6127
DIMETHYLAMINE AQUEOUS	6128	6133
DIMETHYLAMINE AQUEOUS	6134	6141
DIMETHYLAMINE AQUEOUS	6142	6146
DIMETHYLAMINE AQUEOUS	6147	6153
DIMETHYLAMINE AQUEOUS	6154	6160
DIMETHYLAMINE AQUEOUS	6161	6168
DIMETHYLAMINE AQUEOUS	6169	6175
DIMETHYLAMINE AQUEOUS	6176	6178
LIME COMMON OR HY	6716	6737
LIME COMMON OR HY	7077	7086
OIL ANILINE	7605	7614

COMMODITY	Bates Number Start	Bates Number End
OIL ANILINE	6610	6621
OIL ANILINE	6622	6637
OIL ANILINE	6638	6658
OIL ANILINE	6660	6662
OIL ANILINE	6663	6664
OIL ANILINE	6665	6669
OIL ANILINE	6670	6677
OIL ANILINE	6678	6683
OIL ANILINE	6684	6688
OIL ANILINE	6689	6693
OIL ANILINE	6694	6701
OIL ANILINE	6702	6707
OIL ANILINE	6708	6715
OIL ANILINE	10698	10718
POLYETHYLENE	4719	4720
POLYETHYLENE	4721	4723
POLYETHYLENE	4724	4725
POLYETHYLENE	4726	4730
POLYETHYLENE	4731	4733
POLYETHYLENE	4734	4735
POLYETHYLENE	4736	4737
POLYETHYLENE	4738	4741
POLYETHYLENE	4858	4859
POLYETHYLENE	4860	4862
POLYETHYLENE	4863	4864
POLYETHYLENE	4865	4869
POLYETHYLENE	4870	4872
POLYETHYLENE	4873	4874
POLYETHYLENE	4875	4876
POLYETHYLENE	4877	4880
POLYETHYLENE	7149	7152
POTASSIUM CAUSTIC	7088	7088
POTASSIUM CAUSTIC	7115	7125
POTASSIUM CAUSTIC	7126	7131
POTASSIUM CAUSTIC	7132	7137
POTASSIUM CAUSTIC; SODIUM CAUSTIC	7090	7090
PROPANEDIOL BIO	6556	6557
SAND ZIRCON	4672	4673

COMMODITY	Bates Number Start	Bates Number End
SAND ZIRCON	4674	4680
SAND ZIRCON	4681	4681
SAND ZIRCON	5575	5581
SAND ZIRCON	5582	5583
SODIUM CAUSTIC	6292	6296
SODIUM CAUSTIC	6297	6301
SODIUM CAUSTIC	6359	6364
SODIUM CAUSTIC	6365	6374
SODIUM CAUSTIC	6428	6431
SODIUM CAUSTIC	6432	6432
SODIUM CAUSTIC	7070	7076
SODIUM CAUSTIC	7089	7089
SODIUM CAUSTIC	7138	7138
SODIUM CAUSTIC	7139	7139
SODIUM CAUSTIC	7140	7140
SODIUM CAUSTIC	7141	7146
SODIUM CAUSTIC	7147	7148
SODIUM CAUSTIC	7153	7164
SODIUM CAUSTIC	59004	59008
SODIUM CAUSTIC	59009	59013
SODIUM CAUSTIC; WASTE FLAMMABLE LIQUID	6490	6490
SODIUM CAUSTIC; WASTE FLAMMABLE LIQUID	6491	6492
SODIUM CAUSTIC; WASTE FLAMMABLE LIQUID	6493	6494
SODIUM CAUSTIC; WASTE FLAMMABLE LIQUID	6495	6497
SODIUM CAUSTIC; WASTE FLAMMABLE LIQUID	6498	6501
SODIUM CAUSTIC; WASTE FLAMMABLE LIQUID	6502	6505
SODIUM CAUSTIC; WASTE FLAMMABLE LIQUID	6506	6508
SODIUM CAUSTIC; WASTE FLAMMABLE LIQUID	6509	6522
SODIUM CAUSTIC; WASTE FLAMMABLE LIQUID	6523	6524
SODIUM METHYLATE	6558	6604
SODIUM METHYLATE	10719	10765
SULFUR TRIOXIDE	6409	6417
SULFURIC ACID PRODUCTS	DD00314	DD00341
TITANIUM DIOXIDE	5668	5679
TITANIUM DIOXIDE	5680	5683
TITANIUM DIOXIDE	5684	5686
TITANIUM DIOXIDE	5687	5691
TITANIUM DIOXIDE	5692	5696
TITANIUM DIOXIDE	5697	5699
TITANIUM DIOXIDE	5700	5704

COMMODITY	Bates Number Start	Bates Number End
TITANIUM DIOXIDE	5705	5726
TITANIUM DIOXIDE	5727	5730
TITANIUM DIOXIDE	5731	5733
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5198	5203
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5204	5205
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5206	5211
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5212	5212
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5213	5214
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5215	5216
TITANIUM DIOXIDE, TITANIUM TETRACHLORIDE	5217	5258
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5259	5275
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5276	5278
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5279	5280
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5281	5290
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5291	5292
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5293	5302
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5303	5305
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5306	5361
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5362	5363
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5364	5392
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5393	5396
TITANIUM DIOXIDE, TITANIUM TETRACHLORIDE	5397	5400
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5401	5402
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5403	5403
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5404	5412
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5413	5414
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5415	5416
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5417	5418
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5419	5420
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5421	5423
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5424	5424
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5425	5425
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5426	5427
TITANIUM DIOXIDE, TITANIUM TETRACHLORIDE	5428	5429
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5430	5433
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5434	5451
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5452	5461
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5462	5477

COMMODITY	Bates Number Start	Bates Number End
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5478	5486
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5487	5495
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5496	5502
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5503	5512
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5513	5514
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5515	5521
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5522	5540
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5541	5543
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5544	5546
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5547	5552
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5553	5561
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5562	5566
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5567	5570
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5571	5572
TITANIUM DIOXIDE; TITANIUM TETRACHLORIDE	5573	5574
TITANIUM TETRACHLORIDE	5734	5768
TITANIUM TETRACHLORIDE	5769	5819
TITANIUM TETRACHLORIDE	5820	5870
TITANIUM TETRACHLORIDE	5871	5871
TITANIUM TETRACHLORIDE	5872	5878
TITANIUM TETRACHLORIDE	5879	5893
TITANIUM TETRACHLORIDE	5894	5895
TITANIUM TETRACHLORIDE	5896	5898
TITANIUM TETRACHLORIDE	5899	5904
TITANIUM TETRACHLORIDE	5905	5906
TITANIUM TETRACHLORIDE	5907	5907
TITANIUM TETRACHLORIDE	5908	5913
TITANIUM TETRACHLORIDE	5914	5918

*The Bates ranges identified in this chart may be associated with non-truck transportation and/or commodities other than those listed for such ranges. This is not a comprehensive listing. To convert the Bates numbers that do not have a "DD" prefix, add zeros at the beginning to create a 7 digit number.

Interrogatory 41.

Please identify and describe with specificity all studies, analyses, communications, and documents relating to amounts of time required and/or experienced to load and unload the Issue Commodities into or out of trucks. If no such studies or analyses exist for a particular commodity, please explain and quantify the amount of time required to load and unload trucks with that commodity.

Response.

DuPont objects to this Interrogatory as overbroad, unduly burdensome, and irrelevant to the extent it is not limited to truck transportation to or from Issue Facilities served by NS. DuPont objects to this Interrogatory to the extent that it requests information about Issue Commodities that DuPont does not transport by truck. DuPont objects to this Interrogatory to the extent it requires DuPont to conduct a special study to determine the amount of time required to load or unload trucks where DuPont has not already determined such time. DuPont objects to this interrogatory as vague, ambiguous, overbroad, and unduly burdensome in its use of "all," which encompasses every conceivable study, analysis, communication, and document including those bearing little import to the proceeding. Attempting to compile all studies, analyses, communications, and documents regarding truck loading and unloading times would subject DuPont to a burden that is grossly out of proportion to the value of the information sought. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that, to the extent DuPont has not already done so, it will produce or make available for inspection business records or other documents from which the answer to this Interrogatory can be derived or ascertained, or DuPont will provide a supplemental response to the extent that the answer cannot be derived or ascertained from business records. *See* 49 C.F.R. § 1114.26.

Interrogatory 42.

Please identify and describe with specificity all studies, analyses, communications, and documents relating to amounts of time required and/or experienced to load and unload the Issue Commodities into or out of barges or vessels. If no such studies or analyses exist for a particular commodity, please explain and quantify the amount of time required to load and unload barges or vessels with that commodity.

Response.

DuPont objects to this Interrogatory as overbroad, unduly burdensome, and irrelevant to the extent it is not limited to barge or vessel transportation to or from Issue Facilities served by NS. DuPont objects to this Interrogatory to the extent that it requests information about Issue Commodities that DuPont does not transport by barge or vessel. DuPont objects to this Interrogatory to the extent it requires DuPont to conduct a special study to determine the amount of time required to load or unload barges and vessels where DuPont has not already determined such time. DuPont objects to this interrogatory as vague, ambiguous, overbroad, and unduly burdensome in its use of "all," which encompasses every conceivable study, analysis, communication, and document including those bearing little import to the proceeding. Attempting to compile all studies, analyses, communications, and documents regarding barge and vessel loading and unloading times would subject DuPont to a burden that is grossly out of proportion to the value of the information sought. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that it will produce or make available for inspection business records or other documents from which the answer to this Interrogatory can be derived or ascertained, or a supplemental response to the extent that the answer cannot be derived or ascertained from business records. *See* 49 C.F.R. § 1114.26.

Interrogatory 43.

For each of the Issue Commodities, please state whether DuPont contends that truck transportation of that Issue Commodity is infeasible, impractical, or unwarranted because of (i) the physical characteristics of that commodity, (ii) the hazardous nature of the commodity; and/or (iii) concerns that truck transportation would adversely affect product quality. If DuPont contends that truck transportation of any Issue Commodity is infeasible, impractical, or unwarranted for any of these reasons, describe the particular commodity characteristics or product quality concerns that DuPont believes support that contention.

Response.

DuPont objects to this Interrogatory because it requires DuPont to perform a special study to assess whether transporting an Issue Commodity by truck is infeasible, impractical, or unwarranted. DuPont interprets "truck transportation" to mean bulk truck transportation. DuPont objects to this Interrogatory as a premature and inappropriate demand for DuPont to develop and disclose work product and its litigation position before the submission of opening evidence. DuPont objects to this Interrogatory as overbroad and unduly burdensome to the extent it requests all facts, commodity characteristics, and quality concerns that support its contentions—ascertaining and providing all such information will subject DuPont to a burden that is grossly out of proportion to the value of the information. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that, to the extent DuPont has not already done so, it will provide information at the appropriate time, including business records under 49 C.F.R. § 1114.26, about whether transporting an Issue Commodity by truck is infeasible, impractical, or unwarranted. Further, DuPont has already produced, subject to its objections, a plethora of factual information regarding the characteristics and nature of the Issue Commodities.

Interrogatory 44.

For each of the Issue Commodities, please state whether DuPont contends that barge or vessel transportation of that Issue Commodity is infeasible, impractical, or unwarranted because of (i) the physical characteristics of that commodity, (ii) the hazardous nature of the commodity; and/or (iii) concerns that barge or vessel transportation would adversely affect product quality. If DuPont contends that barge or vessel transportation of any Issue Commodity is infeasible, impractical, or unwarranted for any of these reasons, describe the particular commodity characteristics or product quality concerns that DuPont believes support that contention.

Response.

DuPont objects to this Interrogatory because it requires DuPont to perform a special study to assess whether transporting an Issue Commodity by barge or vessel is infeasible, impractical, or unwarranted. DuPont objects to this Interrogatory as a premature and inappropriate demand for DuPont to develop and disclose work product and its litigation position before the submission of opening evidence. DuPont objects to this Interrogatory as a premature and inappropriate demand for DuPont to develop and disclose work product and its litigation position before the submission of opening evidence. DuPont objects to this Interrogatory as overbroad and unduly burdensome to the extent it requests all facts, commodity characteristics, and quality concerns that support its contentions—ascertaining and providing all such information will subject DuPont to a burden that is grossly out of proportion to the value of the information. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that, to the extent DuPont has not already done so, it will provide information at the appropriate time, including business records under 49 C.F.R. § 1114.26, about whether transporting an Issue Commodity by barge or vessel is infeasible, impractical, or unwarranted. Further, DuPont has already produced, subject to its objections, a plethora of factual information regarding the characteristics and nature of the Issue Commodities.

<u>Interrogatory 45.</u>

For each of the Issue Commodities, please state whether DuPont contends that transloading of that Issue Commodity (including transloading between trucks and railcars, barges and railcars, and vice versa) is infeasible, impractical, or unwarranted because of (i) the physical characteristics of that commodity, (ii) the hazardous nature of the commodity; and/or (iii) concerns that transloading would adversely affect product quality. If DuPont contends that transloading of any Issue Commodity is infeasible, impractical, or unwarranted for any of these reasons, describe the particular commodity characteristics or product quality concerns that DuPont believes support that contention.

Response.

DuPont objects to this Interrogatory because it requires DuPont to perform a special study to assess whether transloading an Issue Commodity is infeasible, impractical, or unwarranted. DuPont objects to this Interrogatory as a premature and inappropriate demand for DuPont to develop and disclose work product and its litigation position before the submission of opening evidence. DuPont objects to this Interrogatory as a premature and inappropriate demand for DuPont to develop and disclose work product and its litigation position before the submission of opening evidence. DuPont objects to this Interrogatory as overbroad and unduly burdensome to the extent it requests all facts. commodity characteristics, and quality concerns that support its contentions—ascertaining and providing all such information will subject DuPont to a burden that is grossly out of proportion to the value of the information. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that, to the extent DuPont has not already done so, it will provide information at the appropriate time, including business records under 49 C.F.R. § 1114.26, about whether transloading an Issue Commodity is infeasible, impractical, or unwarranted. Further, DuPont has already produced. subject to its objections. a plethora of factual information regarding the characteristics and nature of the Issue Commodities.

Interrogatory 46.

For each of the Issue Commodities, please identify the types of trucks suitable for truck transportation of that commodity. If you contend that truck transportation of any Issue Commodity requires the use of specialized trucks (*e.g.*, temperature controlled trucks), describe the basis for that contention in detail.

Response.

DuPont objects to this Interrogatory as overbroad, unreasonably burdensome, and irrelevant to the extent it requests information about truck types used to transport the Issue

Commodities to and from DuPont Issue Facilities. DuPont objects to this Interrogatory to the extent it requires DuPont to perform a special study to determine the types of trucks that are suitable to transport an Issue Commodity. DuPont objects to this interrogatory as vague, ambiguous, overbroad, and unduly burdensome in its use of "types of trucks" because truck type can be defined in a variety of ways and in varying levels of detail. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that, to the extent DuPont has not already done so, it will produce or make available for inspection business records or other documents from which the answer to this Interrogatory can be derived or ascertained, or DuPont will provide a supplemental response to the extent that the answer cannot be derived or ascertained from business records. *See* 49 C.F.R. § 1114.26.

Interrogatory 47.

Please provide the following information with respect to Sentinel Transportation, LLC ("Sentinel"):

a) The nature of DuPont's ownership interest (or other rights or interests) in Sentinel, including whether or not DuPont owns a majority or controlling interest in Sentinel;
b) All other entities with an ownership interest in Sentinel;
c) The total number of trucks owned, leased, and/or operated by Sentinel;
d) Separately for each Issue Commodity, the number of trucks owned, leased, and/or operated by Sentinel that could be used to transport that Issue Commodity;
e) To the extent not previously produced, all Sentinel truck shipments of the issue commodities between 2006 and the present (including both shipments for DuPont's account and shipments for the account of other entities); and
f) To the extent not previously produced, all Sentinel contracts and agreements relating to truck transportation of the issue commodities between 2008 and the present (including both shipments for DuPont's account and shipments for the account of other entities).

Response.

DuPont objects to this Interrogatory as unduly burdensome to the extent it requires DuPont to conduct a special study to ascertain the information requested in parts (c), (d), (e), and (f). DuPont objects to this Interrogatory as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence to the extent it requests information about the ownership interest in Sentinel and resources available to Sentinel, which is a separate organization. Further, DuPont objects to this Interrogatory to the extent that it requests information that is not known to DuPont. Sentinel is a separate legal entity from DuPont. Further, Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that [[

]] Also, for item (e), DuPont only has data for Sentinel truck shipments of the Issue Commodities for which DuPont paid the freight and DuPont has already produced all such data. In addition, DuPont has previously produced all contracts identified in item (f).

<u>Interrogatory 48.</u>

If DuPont has an ownership interest in any other corporation, partnership, or other entity that owns or operates trucks that could be used to transport one or more of the Issue Commodities between any points (hereafter, "Motor Carrier"), please provide the following:

a) The name of the Motor Carrier;
b) The nature of DuPont's ownership interest in the Motor Carrier, including whether or not DuPont owns a majority or controlling interest in the Motor Carrier;
c) All other entities with an ownership interest in the Motor Carrier;
d) The total number of trucks owned, leased, and/or operated by the Motor Carrier;
e) Separately for each Issue Commodity, the number of trucks owned, leased, and/or operated by the Motor Carrier that could be used to transport that Issue Commodity;

f) To the extent not previously produced, all truck shipments by the Motor Carrier of the issue commodities between 2006 and the present (including both shipments for DuPont's account and shipments for the account of other entities); and
g) To the extent not previously produced, all contracts and agreements relating to truck transportation of the issue commodities by the Motor Carrier between 2008 and the present (including both shipments for DuPont's account and shipments for the account of other entities).

Response.

Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, DuPont responds that [[ ]] DuPont incorporates its responses and objections to Interrogatory 47.

__Interrogatory 49.__

For each truck owned or leased by DuPont, Sentinel Transportation LLC, or any other Motor Carrier identified in response to Interrogatory 48, and for each of the calendar years 2008 to the present, please provide the following:

a) The owner or lessee of the truck;
b) The location(s) from which the truck is assigned;
c) Truck model or type;
d) Date of purchase or lease;
e) Original cost plus additions and betterments;
f) Description of financing vehicle (e.g., equipment trust);
g) Debt rate as a percent;
h) Finance terms (in years);
i) Annual depreciation;
j) Accrued depreciation;
k) If leased, whether capital or operating lease; and
l) All Issue Commodities that the truck could be used to transport.

Response.

DuPont objects to this Interrogatory as overbroad, unduly burdensome, and irrelevant to the extent it requests information about trucks that are not used to transport Issue Commodities to or from DuPont Issue Facilities. DuPont objects to the use of "truck" in this Interrogatory as vague and ambiguous because the term is subject to multiple meanings. DuPont interprets "truck" to mean bulk trailer. Further, DuPont objects to this Interrogatory as unduly burdensome and requiring a special study. For DuPont-owned trucks, DuPont does not keep an inventory of the trucks that it owns and would have to scour every DuPont facility in the United States to obtain the requested information. DuPont objects to this interrogatory as overbroad and irrelevant because it requests ownership, use, and finance information for trucks that are not used by DuPont to transport the Issue Commodities to or from the Issue Facilities served by NS. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections. DuPont responds that, to the extent DuPont has not already done so, it will produce or make available for inspection business records or other documents from which the answer to this Interrogatory can be derived or ascertained, or DuPont will provide a supplemental response to the extent that the answer cannot be derived or ascertained from business records. *See* 49 C.F.R. § 1114.26.

Interrogatory 50.

> If DuPont has an ownership interest (or other rights or interests) in any corporation, partnership, or other entity that owns, leases, or operates barges or vessels that could be used to transport one or more of the Issue Commodities between any points (hereafter, "Water Carrier"), please identify the following:
> a) The name of the Water Carrier;
> b) The nature of DuPont's ownership interest in the Water Carrier, including whether or not DuPont owns a majority or controlling interest in the Water Carrier;
> c) All other entities with an ownership interest in the Water Carrier;
> d) The total number of barges and/or vessels owned, leased, and/or operated by the Water Carrier;
> e) Separately for each Issue Commodity, the number of barges and/or vessels owned, leased, and/or operated by the Water Carrier that could be used to transport that Issue Commodity;
> f) To the extent not previously produced, all barge and/or vessel shipments by the Water Carrier of the issue commodities between 2006 and the present (including both shipments for DuPont's account and shipments for the account of other entities); and
> g) To the extent not previously produced, all contracts and agreements relating to barge and/or vessel transportation of the issue commodities by the Water Carrier between

2008 and the present (including both shipments for DuPont's account and shipments for the account of other entities).

Response.

Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, DuPont does not have an ownership interest, or other rights or interests, in any Water Carrier.

Interrogatory 51.

For each barge or vessel owned or leased by DuPont or any Water Carrier identified in response to Interrogatory 50, and for each of the calendar years 2008 to the present, please provide the following:

a) The owner or lessee of the barge or vessel;
b) The location(s) from which the barge or vessel is assigned;
c) Barge or vessel model or type;
d) Date of purchase or lease;
e) Original cost plus additions and betterments;
f) Description of financing vehicle (e.g., equipment trust);
g) Debt rate as a percent;
h) Finance terms (in years);
i) Annual depreciation;
j) Accrued depreciation;
k) If leased, whether capital or operating lease; and
l) All Issue Commodities that the barge or vessel could be used to transport.

Response.

DuPont objects to this Interrogatory as overbroad, unduly burdensome, and irrelevant to the extent it seeks information about barges or vessels owned or leased by DuPont, but not used to transport an Issue Commodity to or from an Issue Facility served by NS. DuPont objects to this Interrogatory to the extent it request information that is known only to third parties. DuPont objects to this Interrogatory to the extent it requires DuPont to perform a special study to determine the Issue Commodities that a particular barge or vessel could transport. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that it does not own any bargcs and produced all barge lease agreements found during a reasonable search and from which the answer to this Interrogatory can be derived or ascertained. *See* 49 C.F.R. § 1114.26. For the barge lease agreements that DuPont has produced, please see the documents at the following Bates number ranges:

Bates Number Start	Bates Number End
0060188	0060223
0060224	0060254
0060357	0060392
0060393	0060423
0060424	0060455
0060456	0060466
0060467	0060489

Interrogatory 52.

Please identify and describe with specificity all studies, analyses, Forecasts, communications, and documents related to (i) personnel costs; (ii) rail car costs; (iii) storage costs; (iv) inventory costs; and/or (v) any other costs associated with use of a particular transportation mode for any and all of the Issue Commodities.

Response.

DuPont objects to this Interrogatory as overbroad, unduly burdensome, and irrelevant to the extent it seeks information about costs not associated with the use of a transportation mode to transport Issue Commodities to or from an Issue Facility served by NS. DuPont objects to this Interrogatory as overbroad and unduly burdensome to the extent it requires DuPont to conduct a special study to ascertain the requested cost information. DuPont objects to this Interrogatory as vague, ambiguous, overbroad, and unduly burdensome because of its use of "all," which encompasses every conceivable study, analysis, communication, and document, including those bearing little import to the proceeding. Ascertaining and providing the information sought will subject DuPont to a burden that is grossly out of proportion to the value of such information.

DuPont objects to this Interrogatory as prematurely requesting information about studies, analyses, Forecasts, communications, and documents that do not exist and have not been developed. DuPont objects to this Interrogatory as vague, ambiguous, overbroad, and unduly burdensome to the extent it uses "related to" and "associated with," and interprets the Interrogatory to request studies, analyses, and Forecasts that can be obtained in a reasonable search and evaluate particular modes of transportation in which DuPont analyzed personnel costs, rail car costs, storage costs, inventory costs, and/or other costs of using a particular mode of transportation to transport the Issue Commodities. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont responds that, to the extent DuPont has not already done so, it will produce or make available for inspection business records or other documents from which the answer to this Interrogatory can be derived or ascertained. *See* 49 C.F.R. § 1114.26.

REQUESTS FOR PRODUCTION

Request for Production 22.

> Produce all documents, data, or information identified or referenced in your responses to NS's Second Set of Interrogatories, and all documents or other information you reviewed, consulted, considered, or relied upon in developing or preparing those responses.

Response.

DuPont objects to this Request for Production ("RFP") as being duplicative of other discovery requests and to the extent it calls for the production of documents that are privileged or protected from discovery. DuPont objects to this RFP as vague, ambiguous, overbroad, and unduly burdensome, especially in its use of "all," which encompasses every conceivable document and piece of data and information, including those bearing little import to the proceeding and those that cannot be found during a reasonable search. Ascertaining and providing the items sought will subject DuPont to a burden that is grossly out of proportion to the value of such items. DuPont incorporates each objection to each Interrogatory as if fully stated herein. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or the specific individual objections, DuPont will produce documents in response to this request to the extent not otherwise produced.

Request for Production 23.

Produce all documents related to studies, projects, and capital expenses to enhance truck loading capacity at the Issue Facilities, including but not limited to the studies referenced in "F Unit PV Hopper Truck Loading Options Project Update," DD000280—0300.

Response.

DuPont objects to this RFP as overbroad, unduly burdensome, and irrelevant to the extent it is not limited to truck loading capacity at DuPont Issue Facilities. DuPont objects to this RFP as vague, ambiguous, overbroad, and unduly burdensome, especially in its use of "all," which encompasses every conceivable document, including those bearing little import to the proceeding. Ascertaining and providing the documents sought will subject DuPont to a burden that is grossly out of proportion to the value of such documents. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections. DuPont will produce documents in response to this request to the extent not otherwise produced and to the extent they exist and can be found by a reasonable search.

Request for Production 24.

Produce any photographs, videos, site plans, or schematics for barge docks, barge slips, and facilities necessary to load or unload barges at either (i) Issue Facilities with water access (including but not limited to the DuPont facilities at Lemoyne, AL; Delisle, MS; Pascagoula, MS; Loudon, TN; Dowling, TX; and Belle, WV); or (ii) facilities of DuPont customers who ship or receive one or more of the Issue Movements (including but not limited to the Olin facility at McIntosh, AL and the Stolthaven facility at Braithwaite, LA).

Response.

DuPont objects to this RFP as overbroad, unduly burdensome, and irrelevant to the extent it requests records regarding Issue Facilities that NS does not serve. DuPont objects to this RFP to the extent it requests records that are not in the custody, possession, or control of DuPont. DuPont objects to this RFP as vague, ambiguous, overbroad, and unduly burdensome, especially in its use of "any," which encompasses every conceivable record, including those bearing little import to the proceeding. Ascertaining and providing the records sought will subject DuPont to a burden that is grossly out of proportion to the value of such records. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont has produced site plans depicting barge docks, slips, and facilities for all DuPont Issue Facilities served by NS that have such docks, slips, and facilities.

Request for Production 25.

For all non-DuPont entities who are consignees, consignors, or ultimate originators or recipients of any of the Issue Shipments ("Issue Shipper/Receiver"), produce all documents, including analyses, Forecasts, or statements in your possession, custody or control (whether created by you, the Issue Shipper/Receiver, or another entity), relating to (i) future shipments of the Issue Commodities to or from that Issue Shipper/Receiver; (ii) that Issue Shipper/Receiver's future production or consumption of the Issue Commodities; and/or (iii) that Issue Shipper/Receiver's intentions regarding future production, consumption, purchases, sales, and/or transportation of the Issue Commodities.

Response.

DuPont objects to this RFP as overbroad, unduly burdensome, and irrelevant to the extent it requests documents regarding the portion of Issue Movements that are not on NS. DuPont objects to this RFP as vague, ambiguous, overbroad, and unduly burdensome, especially in its use of "all," which encompasses every conceivable document, including those bearing little import to the proceeding. Ascertaining and providing the documents sought will subject DuPont to a burden that is grossly out of proportion to the value of such documents. DuPont objects to this RFP's use of "Issue Shipments," which is not a defined term, as vague and ambiguous and interprets it to mean "Issue Movements." DuPont objects to this RFP to the extent it requests inadmissible documents that are not reasonably calculated to lead to the discovery of admissible evidence. DuPont objects to this RFP as overbroad, unduly burdensome, irrelevant, and unintelligible to the extent it requests documents concerning an Issue Shipper/Receiver's intention regarding future production, consumption, purchases, sales, and/or transportation of the issue Commodities. Subject to and without waiving any of its General Objections, Objections to Definitions, Objections to Instructions, or these specific objections, DuPont has produced extensive Forecast documents which are responsive to this request and has no other relevant documents that would be found in a reasonable search.

Respectfully submitted,

Jeffrey O. Moreno
Sandra L. Brown
Jason D. Tutrone
Thompson Hine LLP
1920 N Street, N.W., Suite 800
Washington, D.C. 20036
(202)331-8800

Counsel to E.I. du Pont de Nemours and Company

Dated: October 19, 2011

Certificate of Service

I hereby certify that on this 19th day of October 2011, I served the foregoing Complainant's Objections and Responses to Defendant's Second Set of Interrogatories and Requests for Production via e-mail and first class mail upon:

G. Paul Moates
Paul Hemmersbaugh
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Counsel for Norfolk Southern Railway Company

Jason D. Tutrone

Exhibit B

EXHIBIT C

2/29/96 J Com 2B
1996 WLNR 880153

JOURNAL OF COMMERCE

February 29, 1996

Section: TRANS

Du Pont Combines Bulk Truck Fleet Operations

GREGORY S JOHNSON Journal of Commerce Staff

E I du Pont de Nemours & Co has combined its far-flung bulk truck fleet into a medium-sized carrier serving all segments of the petrochemical and chemical concern.

Although there was speculation that it would offer commercial services, the new company, called **Sentinel Transportation** Co , will remain a dedicated carrier for Du Pont, hauling bulk chemicals, petroleum products, crude oil and waste

"We certainly recognized the ability to operate for-hire, but it is not in our plans right now," said Hugh Fischer, manager of distribution operations for Du Pont and Sentinel's chairman

What Du Pont did was take all the truck fleets operating under its Conoco Inc petroleum subsidiary in Houston and move them under its chemical operations.

The new company boasts 400 tractors operating from 60 terminals.

The move allows Sentinel to operate as a true trucking company, rather than a small piece of a large petrochemical corporation, said Jerry L. Carson, Sentinel's president He formerly managed Du Pont's private fleet.

"By being able to model ourselves more closely on the transportation industry we can adopt more of the industry's practices," Mr. Fischer said

The move reflects continuing shipper confidence in private fleets, despite well-known instances where large shippers have scrapped their in-house truck fleets.

Exhibit C

An organization can achieve an economy of scale by having a companywide private fleet because it results in better equipment utilization improves ability for backhauls, said Ron Roth, executive vice president of Transportation Technical Services Inc., a national trucking industry publisher and database.

"You can improve the bottom line and achieve the objective of quality service at a lower price," he said.

Mr. Fischer said little operational changes will result from the move, except that all the terminals will now operate in unison.

Internally, there will be accounting practice changes. But the biggest change will be for Sentinel's drivers. From now on, their pay and benefits will now reflect those of other truckers in the bulk-hauling industry.

---- INDEX REFERENCES ---

COMPANY: EI DU PONT DE NEMOURS AND CO; CONOCO INC

INDUSTRY: (Transportation (1TR48); Freight Transportation (1FR88); Trucking (1TR88))

Language: EN

OTHER INDEXING: (CONOCO INC; DU PONT; DU PONT COMBINES BULK TRUCK FLEET; PONT DE NEMOURS CO; SENTINEL; SENTINEL TRANSPORTATION CO; TRANSPORTATION TECHNICAL SERVICES INC) (Fischer; Hugh Fischer; Internally; Jerry L. Carson; Ron Roth) (TRANSPORT; TRUCKING; BULK; E.I. DUPONT DE NEMOURS; CHEMICAL; SENTINEL TRANSPORTATION; US)

EDITION: Five Star

Word Count: 425
2/29/96 JCOMMERCE 2B
END OF DOCUMENT

Exhibit C

EXHIBIT D

Articles

Member Profile: Sentinel Transportation

The Sentinel Transportation Plan

A case study in the art of strategic planning

By definition, private fleets serve the transportation interests and operate as an extension of companies engaged in a business outside of transportation. In the world of private carriage, **Sentinel Transportation** is unique in that the fleet, headquartered in Wilmington, Del., serves two masters – DuPont and ConocoPhillips.

To excel in this challenging environment requires much planning, thought, discipline and communication – something at which Sentinel and its leadership team excel. "You can't predict, but you can plan," says Ralph Benson, president of the joint venture. And plan they do – every step of the way.

To understand how Sentinel puts its strategic planning process into action requires a look in the rear view mirror. That's because Benson attributes much of Sentinel's current and future success to the heritage of shared values that were in place prior to 198[illegible] when both DuPont and Conoco operated their own private fleets.

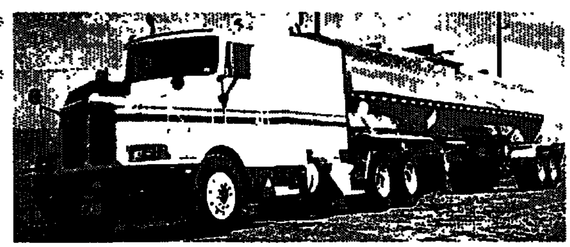
"Trucking will always be needed to deliver the product," says Benson. "But that doesn't necessarily mean Sentinel will. The only way a joint venture such as Sentinel will survive is if the parents have similar core values. DuPont and ConocoPhillips are aligned on safety and functional expertise. We have built the business model around those two competencies."

In the mid 80s, after DuPont acquired Conoco, the fleets were combined and operated under Conoco management. About 10 years later, in 19[illegible], both companies agreed to merge their transportation interests into one private fleet – and Sentinel Transportation Co. was born as a wholly owned subsidiary of DuPont to operate the private fleet for the corporation.

[illegible] years later, Conoco was spun off from DuPont, raising questions about how the fleet would survive and what it would look like. The companies conducted a study of transportation alternatives and decided to form Sentinel Transportation LLC and operate it as a joint venture. The agreement provided Sentinel the freight of its two major shippers as its sole business and both companies retained a proven transportation provider.

But the changes for the fleet were not over as witnessed by the merger of Conoco with Phillips Petroleum to create ConocoPhillips, which was operating its own private fleets which were consolidated into the joint venture earlier this year.

Today, Sentinel ranks with the nation's top 20 largest for-hire bulk carriers. But its size masks the diversity of the fleet. Between the two controlling partners, Sentinel's customer base includes some 1[illegible] business entities producing everything from crude oil to specialty chemicals, from explosives to plastic pellets, out of 4[illegible] separate terminal facilities – the largest of which dominates 2[illegible] power units. The private fleet serves interplant movements as well as distribution to DuPont and ConocoPhillips customers. "Sentinel embodies an expertise and focus on trucking only," says Benson. "Plus by operating as one fleet, we are able to lower our cost structure by eliminating redundant operations such as overhead, compensation, benefits, marketing and billing."



Perhaps more importantly, the joint venture allows Sentinel to leverage its strength and create synergy across its operations in terms of geographic location, equipment interchange [illegible] and [illegible]. "We get [illegible] management, our systems, our support, and we can draw on our internal best practices," notes Benson. "Plus we have the ability to shift resources between the two partners."

"Admittedly, it's a balancing act – we try to get the best of all worlds of being separate from our parent companies and together," he says. "We have realized that we don't have to do everything to be successful."

In the course of setting its strategic plan, Sentinel conducted compared its current state of operations against its best analysis of what the future might look like. Specifically the current state looked at the following elements:

1 Competitor Analysis

- Offering
- Capabilities
- Weaknesses
- Strategic Thrust
- Likelihood of Success
- [illegible]

2 Sources of Competitive Advantage

- Most Important
  Safety
  Cost
  [illegible]
- Other Sources
  Service
  Turnover

Exhibit D

3. Market Environment

- Margins
- Barriers to Entry
- Customer/Supplier Leverage
- Regulation
- Scale
- Geography

4. Voice of the Customer

- Selection Criteria
- Values
- Satisfaction
- Unmet Needs
- Opportunities
- Willingness to Pay

5. Financial & Operating History

- Revenue
- Cost
- Overhead
- Customer Base
- Productivity
- Etc.

6. Key Internal Issues

- Operational
- Organizational
- Political

7. Key External Trends

- Workforce
- Equipment
- Regulation

The process arrived at a solid understanding of why Sentinel exists in the first place. Says Benson, Sentinel s purpose is

- to be the low cost provider of truck transportation based upon customer requirements
- to provide related services which could not be provided as effectively by other suppliers
- to help manage the risk of hazardous and service sensitive materials where there is a high consequence of failure, and
- to provide marketplace leverage and insight into trucking operations

That mission keeps Sentinel focused on what it should do and, equally important, what it should not do "We don t try to be all things to all people," explains Benson "If you're saying yes to one customer, you're saying no somewhere else It's important to focus on what you do well and walk away from business that doesn't fit the model That is accomplished by having discipline around your values."

Those core values represent "what we believe and how we will behave," he says. They include

- **Safety.** The safety of employees, customers and the public is our top priority We realize the personal and business costs of safety failures are too high
- **Service.** We understand the customer drives our efforts We will communicate with our customers, in such a manner that common goals, objectives and improvements are continuous
- **People:** We will foster a well-trained, innovative and diverse workforce, capable of exceeding the demands of a highly competitive market while realizing both personal and professional fulfillment We will be a seamless organization, one team and fully engaged with the utmost respect and support for one another
- **Corporate Membership.** We will be an integral team member within DuPont and ConocoPhillips, highly valued for our abilities and contributions
- **Financial:** We will operate prudently and manage our costs effectively We realize that sound financial performance is critical to our ongoing success
- **Regulatory** We will act in both a responsible and cost effective manner with regard to compliance
- **Ethics.** We will maintain the highest standard of ethical behavior and integrity in the conduct of all our activities

Bringing the values to life starts with communication alignment of objectives and rigorous measurement of critical objectives - or key performance indicators

Benson takes each of the core values and translates them into actionable – and measurable objectives For instance in the area of safety, he monitors collisions injuries, spills, training and compliance, responsible care and security

In the area of service, he looks to minimize service incidents, maximize on-time pickup and delivery, operate proper equipment, develop trained and courteous employees, optimize efficiencies and minimize customer oversight

He and his team go the extra mile to deliver unsurpassed customer service – whether it's providing a shuttle service in customer yards, spotting trailers or eliminating duplication in handoffs

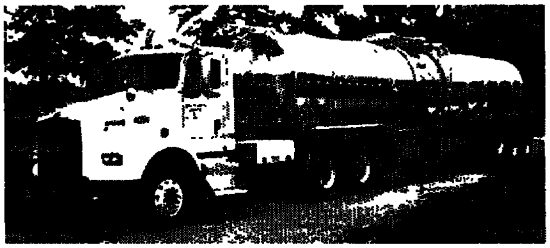
He also measures Sentinel's cost effectiveness – how it adds value to DuPont's and ConocoPhillips overall supply chain "We have rates which can be easily benchmarked against other carriers to see if we are living up to our expectations," says Benson "There is absolutely no mandate to use Sentinel. We have to earn the business over the long-term "

Earn it he does The $90 million fleet, nearly evenly divided between DuPont and ConocoPhillips, operates 410 tractors and 1 200 highly specialized trailers, including liquid build tankers (406, 407, 412), dry bulk, refrigerated, roll-off end dumps and pressurized tankers, not to mention a number of dry and refrigerated vans The fleet employs 730

Exhibit D

[illegible] including [illegible] drivers, 4[illegible] mechanics and 2[illegible] dispatchers.

[illegible] and [illegible] are set by [illegible] well versed in the unique operations of [illegible] and [illegible] the degree possible are standardized [illegible] operation to provide the greatest degree of interchangeability and [illegible].



[illegible] tractors on average every [illegible] years while [illegible] to get 1[illegible] years out of [illegible]. All equipment is obtained [illegible] financial lease and the company will [illegible] at the end of the lease depending on the estimated useful [illegible] remaining.

[illegible] problems [illegible] attracting and [illegible] new drivers. Pulling out a chart that [illegible] the average age of drivers, he said [illegible] even though turnover was low [illegible] averaging 10-15 [illegible]. The average age of [illegible] and he [illegible] finding it more and more difficult to attract younger drivers into the operation.

[illegible] drivers [illegible] is getting [illegible] he says. "We must [illegible] the workforce that can continue to operate in this fashion without compromising our standards."

[illegible] of the fleet operation, drivers are paid in a variety of ways from hourly to mileage [illegible]. Annual safety [illegible] based on a certain percentage of pay are also paid out. The one unifying philosophy of all pay and benefit programs is an understanding that employees should be paid for a [illegible] worked. That means the minute they begin waiting to be [illegible] they are being paid. This also includes training and safety meetings.

[illegible] understands that pay and benefits are [illegible] to [illegible] in order to retain them [illegible] all about the people," he says. "People don't leave good companies. They stay where they are appreciated and treated fairly."

Exhibit D

EXHIBIT E

DUPONT E I DE NEMOURS & CO (DD)

11-K

Annual report of employee stock purchase, savings and similar plans
Filed on 06/27/2011
Filed Period 12/31/2010

Exhibit E

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, DC 20549

FORM 11-K

(Mark One)

☒ **ANNUAL REPORT PURSUANT TO SECTION 15(d) OF THE SECURITIESEXCHANGE ACT OF 1934**

For the fiscal year ended December 31, 2010

OR

☐ **TRANSITION REPORT PURSUANT TO SECTION 15(d) OF THE SECURITIESEXCHANGE ACT OF 1934**

Commission file number 1-815

THRIFT AND SAVINGS PLAN FOR EMPLOYEES OF SENTINEL TRANSPORTATION, LLC
(Full title of plan)

E. I. DU PONT DE NEMOURS AND COMPANY
1007 Market Street
Wilmington, Delaware 19898
(Name of issuer of the securities held pursuant to the Plan
and the address of its principal executive office)

Exhibit E

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THRIFT AND SAVINGS PLAN FOR EMPLOYEES OF SENTINEL TRANSPORTATION, LLC

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* All other schedules required by Section 2520.103-10 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974 have been omitted because they are not applicable.

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REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Participants and Administrator of
Thrift and Savings Plan for Employees of Sentinel Transportation, LLC

In our opinion, the accompanying statements of net assets available for benefits and the related statement of changes in net assets available for benefits present fairly, in all material respects, the net assets available for benefits of Thrift and Savings Plan for Employees of Sentinel Transportation, LLC (the "Plan") at December 31, 2010 and 2009, and the changes in net assets available for benefits for the year then ended December 31, 2010 in conformity with accounting principles generally accepted in the United States of America. These financial statements are the responsibility of the Plan's management. Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits of these statements in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements, assessing the accounting principles used and significant estimates made by management, and evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

Our audits were conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The supplemental Schedule of Assets (Held at End of Year) is presented for the purpose of additional analysis and is not a required part of the basic financial statements but is supplementary information required by the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974. This supplemental schedule is the responsibility of the Plan's management. The supplemental schedule has been subjected to the auditing procedures applied in the audits of the basic financial statements and, in our opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

/s/ PricewaterhouseCoopers LLP

Philadelphia, Pennsylvania
June 27, 2011

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THRIFT AND SAVINGS PLAN FOR EMPLOYEES OF SENTINEL TRANSPORTATION, LLC

STATEMENTS OF NET ASSETS AVAILABLE FOR BENEFITS
AS OF DECEMBER 31, 2010 AND 2009

	2010	2009
Assets:		
Investments, at fair value:		
Plan interest in DuPont and Related Companies Defined Contribution Plan Master Trust	$ 38,148,839	$ 33,824,751
Company stocks	4,288,214	3,132,632
Participant-directed brokerage account	1,010,628	568,232
Total investments	43,447,681	37,525,615
Receivables:		
Employer's contributions	1,569,569	1,558,314
Participants' contributions	—	94,398
Accrued income	13,896	13,879
Notes receivable from participants	1,920,071	1,473,488
Total receivables	3,503,536	3,140,079
Total assets	46,951,217	40,665,694
Liabilities:		
Other liabilities	—	158,476
Net assets available for benefits, at fair value	46,951,217	40,507,218
Adjustments from fair value to contract value for fully benefit-responsive investment contracts	(1,068,977)	(476,210)
Net assets available for benefits	$ 45,882,240	$ 40,031,008

See Notes to Financial Statements beginning on page 4

Exhibit E

THRIFT AND SAVINGS PLAN FOR EMPLOYEES OF SENTINEL TRANSPORTATION, LLC

STATEMENT OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS
FOR THE YEAR ENDED DECEMBER 31, 2010

	2010
Additions:	
Investment income:	
Net investment gain from Plan interest in DuPont and Related Companies Defined Contribution Plan Master Trust	$ 2,997,065
Net appreciation in fair value of investments	1,552,191
Dividends	158,662
Total investment income	4,707,918
Contributions:	
Employer's contributions	3,285,512
Participants' contributions	2,424,114
Rollovers	44,588
Total contributions	5,754,214
Interest from notes receivable from participants	86,866
Total additions	10,548,998
Deductions:	
Benefits paid to participants	4,694,827
Administrative expenses	2,939
Total deductions	4,697,766
Net increase	5,851,232
Net assets available for benefits:	
Beginning of year	40,031,008
End of year	$ 45,882,240

See Notes to Financial Statements beginning on page 4.

Exhibit E

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THRIFT AND SAVINGS PLAN FOR EMPLOYEES OF SENTINEL TRANSPORTATION, LLC

NOTES TO FINANCIAL STATEMENTS
AS OF DECEMBER 31, 2010 AND 2009, AND FOR THE YEAR ENDED DECEMBER 31, 2010

NOTE 1 — DESCRIPTION OF THE PLAN

The following description of the Thrift and Savings Plan for Employees of Sentinel Transportation, LLC (the "Plan") is provided for general purposes only. Participants should refer to the Plan agreement for a more complete description of the Plan's provisions.

General
The Plan is a defined contribution plan subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), as amended, and the Internal Revenue Code ("IRC") The Plan is a tax-qualified, contributory profit sharing plan. The Plan is available to eligible employees of Sentinel Transportation, LLC (the "Company"), a joint venture whose members are DuPont (80%) and Conoco (20%), as well as employees of affiliated companies that have adopted the Plan.

Administration
The Plan Administrator is the Employee Benefit Plans Board, whose members are appointed by the Board of Managers. The Employee Benefit Plans Board holds authority to appoint trustees and has designated Bank of America, N A. ("Bank of America") and Northern Trust Corporation ("Northern Trust") as trustees for the Plan Bank of America is the trustee for the balances in company stocks and the participant-directed brokerage account and also provides recordkeeping and participant services.

Effective January 28, 2008, the Plan entered into a Master Trust Agreement with Northern Trust to establish the DuPont and Related Companies Defined Contribution Plan Master Trust (the "Master Trust"). The objective of the Master Trust is to allow participants from affiliated plans to invest in several custom designed investment choices through separately managed accounts. DuPont Capital Management Corporation ("DCMC"), a registered investment adviser and wholly-owned subsidiary of DuPont, has responsibility to oversee the investments' managers and evaluate funds' performances under the Master Trust, except for the Master Trust Stable Value Fund (the "Stable Value Fund"), which is managed by DCMC.

Participation
Regular employees are eligible to participate in the Plan on the first day of the calendar month following their date of hire as an employee. Employees of affiliated companies that have adopted the Plan, who have previously met the eligibility requirements of the Plan, are also eligible to participate in the Plan.

Contributions
Eligible employees may participate in the Plan by authorizing the Company to make a payroll contribution under the Plan ranging from 1% to 100% of bi-weekly compensation. The amount contributed will be deposited into a before-tax account Participants' bi-weekly contributions up to 6% are called basic deposits. The Company will contribute an amount equal to 100% of the participant's bi-weekly basic deposits All of the above participants' and Company contributions are subject to regulatory and Plan limitations.

The Plan provides for discretionary retirement savings contributions to participants hired on or after January 1, 2004. The retirement savings contributions for the year ended December 31, 2010 were $1,589,349. The retirement savings contributions are allocated based on the ratio that the participant's compensation bears to the total compensation of all eligible participants

Exhibit E

THRIFT AND SAVINGS PLAN FOR EMPLOYEES OF SENTINEL TRANSPORTATION, LLC

NOTES TO FINANCIAL STATEMENTS
AS OF DECEMBER 31, 2010 AND 2009, AND FOR THE YEAR ENDED DECEMBER 31, 2010

Participant Accounts
Each participant's account is credited with the participant's contribution and allocations of (a) the Company's contributions and (b) Plan earnings. Allocations are based on the ratio of the balance of that participant's investment option account to the sum of the balances of all participants' investment option accounts. The benefit to which a participant is entitled is the benefit that can be provided from the participant's vested account.

Investments
Participants direct the investment of their contribution into various investment options offered by the Plan. The Plan currently offers five passively managed index funds, six actively managed custom-designed funds, 11 target retirement funds, DuPont company stock, a stable value fund and a self-directed brokerage account where participants can choose from approximately 1,400 funds from 70 mutual funds families.

In previous years, the ConocoPhillips Stock Fund was closed to new investments by Plan participants. Plan participants may not invest additional contributions or request a fund transfer into this fund. However, they may transfer out of this fund at any time.

Vesting
Participant contributions and Company's matching contributions are fully and immediately vested. Retirement savings contributions become fully vested after three years of service.

Notes Receivable from Participants
Participants may borrow up to one-half of their non-forfeitable account balances subject to a minimum of $1,000 up to a maximum equal to the lesser of $50,000 or 50% of their vested account balance. The loans are executed by promissory notes and have a minimum term of one year and a maximum term of five years, except for qualified residential loans, which have a maximum term of 10 years. The loans bear an interest rate equal to the average rate charged by selected major banks to prime customers for secured loans. The loans are repaid over the term in installments of principal and interest by deduction from pay. A participant also has the right to repay the loan in full at any time without penalty. At December 31, 2010, the loan interest rates ranged from 4.25% to 9.25%.

Payment of Benefits
Company contributions will be suspended for six months if a participant withdraws, while in-service, any matched before-tax or after-tax savings contributed or company contributions made to the account. Profit sharing contributions and matching contributions contributed on or after January 1, 2004, may be withdrawn only at separation from service or after attaining age 59 ½.

A participant who terminates from active service may elect to make an account withdrawal of all or a portion of their account at any time. A participant who retires from active service may withdraw all or a portion of their account in lump sum or partial payments. Required minimum distributions will begin in April of the calendar year following the later of the year in which the participant attains age 70 ½ or the year following retirement or termination of employment.

Forfeited Accounts
At December 31, 2010 and 2009, forfeited nonvested accounts totaled $74,544 and $90,025, respectively. Forfeitures can be used, as defined by the Plan, to pay administrative expenses and to reduce the amount of future employer contributions. During the year ended December 31, 2010, forfeited accounts were used to offset employer's discretionary retirement savings contributions totaling approximately $81,000.

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Administrative Expenses
Administrative expenses, including, but not limited to, record-keeping expenses, trustee fees and transactional costs may be paid by the Plan, at the election of the Plan Administrator. Expenses paid by the Plan for the year ended December 31, 2010 were $2,939, which excludes expenses paid by the Master Trust. Brokerage fees, transfer taxes, investment fees and other expenses incidental to the purchase and sale of securities and investments shall be included in the cost of such securities or investments, or deducted from the sales proceeds, as the case may be.

NOTE 2 — SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting
The accompanying financial statements of the Plan have been prepared on the accrual basis of accounting in accordance with generally accepted accounting principles in the United States of America ("GAAP").

Fully Benefit-Responsive Investment Contracts
Investment contracts held by a defined contribution plan are required to be reported at fair value. However, contract value is the relevant measurement attributable for that portion of the net assets available for benefits of a defined contribution plan attributable to fully benefit-responsive investment contracts because contract value is the amount participants would receive if they were to initiate permitted transactions under the terms of the Plan. The Statement of Net Assets Available for Benefits presents the fair value of the investment contracts as well as the adjustment of the fully benefit-responsive investment contracts from fair value to contract value. The Statement of Changes in Net Assets Available for Benefits is prepared on a contract value basis.

Use of Estimates
The preparation of financial statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets, liabilities, and changes therein and disclosure of contingent assets and liabilities. Actual results could differ from those estimates.

Risks and Uncertainties
The Plan utilizes various investment options, which include investments in any combination of equities, fixed income securities, individual guaranteed investment contracts, currency and commodities, futures, forwards, options, swaps and derivative contracts. Investment securities, in general, are exposed to various risks, such as interest rate risk, credit risk, and overall market volatility. Due to the level of risk associated with certain investment securities, it is at least reasonably possible that changes in the values of investment securities will occur in the near term and that such change could materially affect participants' account balances and the amounts reported in the financial statements.

Investment Valuation and Income Recognition
The Plan's investments are stated at fair value. Fair value of a financial instrument is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. Company stocks are valued at the year-end market price of the common stocks. The participant-directed brokerage account, which consists of shares of registered investment companies ("mutual funds"), is valued at the net asset value of shares held by the Plan at year-end

Purchases and sales of investments are recorded on a trade-date basis Realized gains and losses on the sale of company stocks are based on average cost of the securities sold. Interest income is recorded on the accrual basis. Dividend income is recorded on the ex-dividend date. Capital gain distributions are included in dividend income.

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Notes Receivable from Participants
Notes receivable from participants are measured at their unpaid principal balance plus any accrued but unpaid interest. Delinquent participant loans are recorded as distributions based on the terms of the Plan document.

Payment of Benefits
Benefit payments to participants are recorded upon distribution.

New Accounting Pronouncements
In January 2010, the Financial Accounting Standards Board ("FASB") issued Accounting Standards Update ("ASU") No. 2010-06, *Fair Value Measurements and Disclosures*, which amends Accounting Standards Codification ("ASC") 820, *Fair Value Measurements and Disclosures*, adding new disclosure requirements for Levels 1 and 2, separate disclosures of purchases, sales, issuances, and settlements relating to Level 3 measurements and clarification of existing fair value disclosures. ASU No. 2010-06 is effective for periods beginning after December 15, 2009, except for the requirement to provide Level 3 activity of purchases, sales, issuances, and settlements on a gross basis, which will be effective for fiscal years beginning after December 15, 2010. The Plan prospectively adopted the new guidance in 2010, except for the Level 3 reconciliation disclosures, which are required in 2011. The adoption in 2010 did not materially affect, and the future adoption is not expected to materially affect, the Plan's financial statements.

In September 2010, the FASB issued ASU No. 2010-25, *Reporting Loans to Participants by Defined Contribution Pension Plans*. The ASU requires that participant loans be classified as notes receivable rather than a plan investment and measured at unpaid principal balance plus accrued but unpaid interest rather than fair value. The Plan retrospectively adopted the new accounting in 2010. The adoption did not have a material effect on the Plan's financial condition.

In March 2011, the FASB issued ASU No. 2011-04, *Amendments to Achieve Common Fair Value Measurement and Disclosure Requirements in U.S. GAAP and International Financial Reporting Standards*. ASU 2011-04 was issued to provide a consistent definition of fair value and ensure that the fair value measurement and disclosure requirements are similar between U.S. GAAP and International Financial Reporting Standards. ASU 2011-04 changes certain fair value measurement principles and enhances the disclosure requirements particularly for Level 3 fair value measurements. This pronouncement is effective for reporting periods beginning on or after December 15, 2011. The Plan is currently evaluating the impact of the adoption on the financial statements.

NOTE 3 — INVESTMENTS

Investments that represent 5% or more of the net assets available for benefits as of December 31, 2010 and 2009 consist of the Plan's interest in the Master Trust and investment in the DuPont Company Stock.

During 2010, the Plan's investments (including gains and losses on investments bought and sold, as well as held during the year) appreciated in value as follows:

	2010
Company stocks	$ 1,441,545
Participant-directed brokerage account	110,646
Net appreciation in fair value of investments	$ 1,552,191

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For the year ended December 31, 2010, the Plan net investment gain from interest in the Master Trust amounted to $2,997,065.

NOTE 4 — INTEREST IN MASTER TRUST

As previously described, effective January 28, 2008, the Plan entered into a Master Trust Agreement with Northern Trust to establish a new Master Trust. This Master Trust contains several actively managed investments pools and commingled index funds offered to participants as "core investment options" and "age-targeted options". The investment pools are administered by different investment managers through separately managed accounts at Northern Trust. The Master Trust also includes the Stable Value Fund.

At December 31, 2010, the Master Trust includes the assets of the following plans:

- DuPont Retirement Savings Plan
- DuPont 401(k) and Profit Sharing Plan
- Thrift and Savings Plan for Employees of Sentinel Transportation, LLC

To participate in the Master Trust, affiliates who sponsor qualified savings plans and who have adopted the Master Trust Agreement are required to make payments to the Trustee of designated portions of employees' savings and other contributions by the affiliate. Investment income relating to the Master Trust is allocated proportionately by investment fund to the plans within the Master Trust based on the Plan's interest to the total fair value of the Master Trust investment funds. The Plan's undivided interest in the Master Trust was 0.45% and 0.43% as of December 31, 2010 and 2009, respectively

Master Trust Investments
The investments of the Master Trust are reported at fair value. Purchases and sales of the investments within the Master Trust are reflected on a trade-date basis. Dividend income is recorded on the ex-dividend date. Interest income is recorded on the accrual basis.

Cash and short-term investments include cash and short-term interest-bearing investments with initial maturities of three months or less. Such amounts are recorded at cost, plus accrued interest, which approximate fair value.

Mutual funds are valued at the net asset value of shares held by the Master Trust at year-end. Units held in common collective trusts ("CCTs") are valued at the net asset value as reported by the CCTs' trustee at year-end.

Common stock, preferred stock, fixed income securities, options and futures traded in active markets on national and international securities exchanges are valued at closing prices on the last business day of each period presented. Securities traded in markets that are not considered active are valued based on quoted market prices, broker or dealer quotations, or alternative pricing sources with reasonable levels of price transparency. Securities that trade infrequently and therefore have little or no price transparency are valued using the trustees' or investment managers' best estimates.

Forward foreign currency contracts are valued at fair value, as determined by the trustees (or independent third parties on behalf of the Master Trust), using quoted forward foreign currency exchange rates. At the end of each period presented, open contracts are valued at the current forward foreign currency exchange rates, and the change in market value is recorded as an unrealized gain or loss. When the contract is closed or delivery taken, the Master Trust records a realized gain or loss equal to the difference between the value of the contract at the time it was opened and the value at the time it was closed.

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Swap contracts are valued at fair value, as determined by the trustees (or independent third parties on behalf of the Master Trust) utilizing pricing models and taking into consideration exchange quotations on underlying instruments, dealer quotations and other market information.

Investments denominated in currencies other than the U.S. dollar are converted using exchange rates prevailing at the end of the periods presented. Purchases and sales of such investments are translated at the rate of exchange on the respective dates of such transactions.

The Master Trust holds contracts that have investments in fully benefit-responsive investment contracts. In accordance with GAAP, an investment contract is generally required to be reported at fair value, rather than contract value, to the extent it is fully benefit-responsive. The fair value of the guaranteed investment contracts ("GICs") is calculated by discounting the related cash flows based on current yields of similar instruments with comparable durations. The fair value of synthetic and separate account GICs are determined using the market price of the underlying securities and the fair value of the investment contract ("wrapper"). The fair value of the wrappers for the GICs are primarily determined by taking the difference between the actual wrap fee of the contract and the price at which the wrapper would issue an identical contract under current market conditions. That change in fees is applied to the year-end book value of the contract to determine the wrapper contract's fair value.

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The following presents the Master Trust's net assets at December 31, 2010 and 2009:

	2010	2009
Assets		
Investments, at fair value:		
Common stocks	$ 1,036,121,034	$ 1,069,544,763
Preferred stocks	3,664,629	5,662,597
Fixed income securities	49,952,320	28,258,005
Mutual funds	299,935,070	110,849,115
CCTs	1,502,499,265	1,217,694,419
Investment contracts	5,563,483,176	5,492,836,673
Cash and short term investments	15,055,667	18,740,468
Total investments	8,470,711,161	7,943,586,040
Cash	144,343	55,938
Receivables for securities sold	13,453,848	3,653,373
Unrealized appreciation on foreign exchange contracts	—	246,716
Accrued income	1,518,871	1,305,186
Other assets	28,662	—
Total assets	8,485,856,885	7,948,847,253
Liabilities		
Payables for securities purchased	25,868,142	9,198,251
Unrealized depreciation on foreign exchange contracts	88,378	—
Accrued expenses	4,472,816	4,620,603
Other liabilities	16,499	28,955
Total liabilities	30,445,835	13,847,809
Master Trust net assets, at fair value	8,455,411,050	7,934,999,444
Adjustment from fair value to contract value for fully benefit-responsive investment contracts	(236,883,567)	(111,699,787)
Master Trust net assets	$ 8,218,527,483	$ 7,823,299,657

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The following presents net investment gain for the Master Trust for the year ended December 31, 2010:

	2010
Change in net appreciation (depreciation) in fair value of investments:	
Investments, at fair value:	
Common stocks	$ 155,154,609
Preferred stocks	558,395
Mutual funds	27,866,364
Fixed income securities	1,929,593
CCTs	183,641,894
Other	2,337
Net foreign currency exchange gains	135,169
Net appreciation on swap agreements	22,974
Net depreciation on foreign exchange contracts	(1,717,704)
Net depreciation on futures contracts	(118,133)
Net increase from investments	367,475,498
Investment income (expense):	
Interest	208,492,488
Dividends	15,220,540
Administrative expenses	(12,961,616)
Net investment gain	$ 578,226,910

Investments of the Master Trust that represent 5% or more of the Master Trust assets as of December 31, 2010 and 2009 were as follows:

	2010	2009
Underlying Assets of Synthetic GICs:		
GEM Trust Short Duration	$ 579,605,654	$ 619,605,204
GEM Trust Risk-Controlled 1	472,783,635	682,195,256
GEM Trust Risk-Controlled 2 [A]	263,681,824	697,484,554
GEM Trust Opportunistic 1 [A]	79,245,476	546,691,462
GEM Trust Opportunistic 2 [A]	315,243,413	719,260,547
GEM Trust Opportunistic 3	442,469,957	606,115,121
PIMCO Separate Account [B]	534,978,466	—
PIMCO Low Duration Fund [C]	—	724,412,126
Separate Account GICs:		
Prudential Retirement & Annuity Co. [B]	1,130,222,021	—
Metropolitan Life Insurance Co. [B]	597,598,653	—

A Investment represents less than 5 percent of the Master Trust net assets as of December 31, 2010.
B Investment was not part of the Master Trust assets as of December 31, 2009.
C Investment was not part of the Master Trust assets as of December 31, 2010.

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Description of the Master Trust's Investment Contracts
The Stable Value Fund invests in traditional GICs, synthetic GICs and separate account GICs. Traditional GICs are comprised of assets held in the issuing company's general account and are backed by the full faith and credit of the issuer. Synthetic and separate account GICs are backed by fixed income assets. The underlying investments held within the synthetic GICs are comprised of DCMC sponsored GEM Trusts and a PIMCO managed separate account fixed income portfolio. The GEM Trusts are commingled fixed income portfolios managed by DCMC and additional investment managers hired by DCMC that invest in high quality fixed income securities across the short, intermediate and core sectors The crediting interest rates on investment contracts ranged from 0.67% to 6 44% for the year ended December 31, 2010 and from 3.69% to 5.83% for the year ended December 31, 2009 The weighted average credited interest rate of return of the investment contracts based on the interest rate credited to participants was 3.89% and 4 06% for the year ended December 31, 2010 and 2009, respectively. The weighted average yield of the investment contracts based on the actual earnings of underlying assets in the Master Trust was 3.50% and 4.54% for the years ended December 31. 2010 and 2009, respectively.

For traditional GICs, the insurer maintains the assets in a general account. Regardless of the performance of the general account assets, a traditional GIC will provide a fixed rate of return as negotiated when the contract is purchased. Synthetic GICs, backed by underlying assets, are designed to provide principal protection and accrued interest over a specified period of time (i.e . period of time before the crediting rate reset) through benefit-responsive wrapper contracts issued by a third party assuming that the underlying assets meet the requirements of the GIC. Separate account GICs are investment contracts invested in insurance company separate accounts established for the sole benefit of stable value fund participants. The assets are wrapped by the financially responsible insurance company. The Master Trust participates in the underlying experience of the separate account via future periodic rate resets.

The crediting rates for synthetic and separate account GICs are reset periodically throughout the year and are based on the performance of the portfolio of assets underlying these contracts Inputs used to determine the crediting rate include each contract's portfolio market value of fixed income assets, current yield-to-maturity, duration (similar to weighted average life) and market value relative to contract value. All contracts have a guaranteed rate of at least 0% or higher with respect to determining interest rate resets.

Traditional GICs expose the Plan through the Stable Value Fund to direct credit risk associated with each contract issuer. To mitigate this risk, the investment guidelines prohibit DCMC from purchasing contracts from issuers with a credit rating lower than Aa3/AA. In addition, the weighted average credit rating of all contracts must be A3/A- or higher at all times and no single traditional GIC issuer may represent more than 5% of the total Stable Value Fund. Additionally, DCMC continually monitors the issuers of these investments through external credit rating agencies. DCMC monitors credit rating history, downgrade/upgrade notifications, and analyst reports for all current and potential issuers. There are no reserves against contract value for credit risk of the contract issuer or otherwise.

Participants may ordinarily direct the withdrawal or transfer of all or a portion of their investment at contract value for plan permitted benefit payments. Certain events may limit the ability of the Plan to transact at contract value with the issuer Such events include the following. (i) amendments to the Plan documents (including complete or partial Plan termination or merger with another plan); (ii) changes to Plan's prohibition on competing investment options or deletion of equity wash provisions, (iii) bankruptcy of the Plan sponsor or other Plan sponsor events (i.e. divestitures or spin-offs of a subsidiary) which cause a significant withdrawal from the Plan or (iv) the failure of the trust to qualify for exemption from federal income taxes or any required prohibited transaction exemption under ERISA. The Plan Administrator does not believe that the occurrence of any such value event, which would limit the Plan's ability to transact at contract value, is probable.

Based on certain events specified in fully benefit-responsive investment contracts, both the Plan/Trust and issuers of such investment contracts are permitted to terminate the investment contracts. If applicable, such terminations can occur prior to the scheduled maturity date.

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Examples of termination events that permit issuers to terminate investment contracts include the following:

- The Plan Sponsor's receipt of a final determination notice from the Internal Revenue Service ("IRS") that the Plan does not qualify under Section 401(a) of the IRC.
- The Trust ceases to be exempt from federal income taxation under Section 501(a) of the IRC.
- The Plan/Trust or its representative breaches material obligations under the investment contract such as a failure to satisfy its fee payment obligations.
- The Plan/Trust or its representative makes a material misrepresentation.
- The Plan/Trust makes a material amendment to the Plan/Trust and/or the amendment adversely impacts the issuer.
- The Plan/Trust, without the issuer's consent, attempts to assign its interest in the investment contract.
- The balance of the contract value is zero or immaterial.
- Mutual consent.
- The termination event is not cured within a reasonable time period, i.e., 30 days.

For synthetic and separate account GICs, additional termination events include the following:

- The investment manager of the underlying securities is replaced without the prior written consent by the issuer.
- The underlying securities are managed in a way that does not comply with the investment guidelines.

At termination, the contract value is adjusted to reflect a discounted value based on surrender charges or other penalties for GICs.

For synthetic and separate account GICs, termination is at market value of the underlying securities less unpaid issuer fees or charges. If the termination event is not material based on industry standards, it may be possible for the Plan/Trust to exercise its right to require the issuer that initiated the termination to extend the investment contract for a period no greater than what it takes to immunize the underlying securities and/or it may be possible to replace the issuer of a synthetic and separate account GIC that terminates the contract with another synthetic and separate account GIC issuer. Both options help maintain the stable contract value.

Financial Instruments with Off-Balance-Sheet Risk in the Master Trust
In accordance with the investment strategy of the managed accounts, the Master Trust's investment managers execute transactions in various financial instruments that may give rise to varying degrees of off-balance-sheet market and credit risk. These instruments can be executed on an exchange or negotiated in the over-the-counter market. These financial instruments include futures, forward settlement contracts, swap and option contracts.

Swap contracts include interest rate swap contracts which involve an agreement to exchange periodic interest payment streams (typically fixed vs. variable) calculated on an agreed upon periodic interest rate multiplied by a predetermined notional principal amount.

Market risk arises from the potential for changes in value of financial instruments resulting from fluctuations in interest and foreign exchange rates and in prices of debt and equity securities. The gross notional (or contractual) amounts used to express the volume of these transactions do not necessarily represent the amounts potentially subject to market risk. In many cases, these financial instruments serve to reduce, rather than increase, the Trust's exposure to losses from market or other risks. In addition, the measurement of market risk is meaningful only when all related and offsetting transactions are identified. The Trust's investment managers generally limit the Trust's market risk by holding or purchasing offsetting positions.

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As a writer of option contracts, the Master Trust receives a premium to become obligated to buy or sell financial instruments for a period of time at the holder's option. During this period, the Trust bears the risk of an unfavorable change in the market value of the financial instrument underlying the option, but has no credit risk, as the counterparty has no performance obligation to the Trust once it has paid its cash premium.

The Master Trust is subject to credit risk of counterparty nonperformance on derivative contracts in a gain position, except for written options, which obligate the Trust to perform and do not give rise to any counterparty credit risk.

NOTE 5 — FAIR VALUE MEASUREMENTS

ASC 820, *Fair Value Measurements and Disclosures*, provides a framework for measuring fair value That framework provides a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value, as follows: Level 1, which refers to securities valued using unadjusted quoted prices from active markets for identical assets: Level 2, which refers to securities not traded on an active market but for which observable market inputs are readily available; and Level 3, which refers to securities valued based on significant unobservable inputs. Assets and liabilities are classified in their entirety based on the lowest level of input that is significant to the fair value measurement.

Fair value calculations may not be indicative of net realizable value or reflective of future fair values Furthermore, although the Plan believes its valuation methods are appropriate and consistent with other market participants, the use of different methodologies or assumptions to determine the fair value of certain financial instruments could result in a different fair value measurement at the reporting date.

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The following table sets forth by level, within the fair value hierarchy, the Plan's and the Master Trust's assets and liabilities at fair value as of December 31, 2010:

	Investments at Fair Value as of December 31, 2010			
	Level 1	Level 2	Level 3	Total
Plan's investments excluding interest in Master Trust:				
Company stocks	$ 4,288,214	$ —	$ —	$ 4,288,214
Participant-directed brokerage account[1]	1,010,628			1,010,628
Total Plan's investments	$ 5,298,842	$ —	$ —	$ 5,298,842
Master Trust's investments:				
Common stocks:				
International common stocks	$ 167,198,740	$ —	$ —	$ 167,198,740
Large-cap domestic common stocks	510,225,660			510,225,660
Mid-cap domestic common stocks	296,682,652	—	—	296,682,652
Small-cap domestic common stocks	62,013,982	—		62,013,982
Total common stocks	1,036,121,034	—	—	1,036,121,034
Investment contracts:				
Separate account GICs	—	2,054,237,682	—	2,054,237,682
Traditional GICs	—	814,045,947	—	814,045,947
Wrapper contracts	—	7,191,123	—	7,191,123
Underlying assets on synthetic GICs:				—
Pooled separate account	—	534,978,466	—	534,978,466
Commingled funds	—	2,153,029,958	—	2,153,029,958
Total investment contracts	—	5,563,483,176	—	5,563,483,176
Preferred stocks	3,664,629	—	—	3,664,629
Fixed income securities	—	49,952,320	—	49,952,320
Mutual funds	299,935,070	—	—	299,935,070
CCTs	—	1,502,499,265	—	1,502,499,265
Cash and short term investments	—	15,055,667	—	15,055,667
Total Trust investments assets	1,339,720,733	7,130,990,428	—	8,470,711,161
Other financial instruments[2]	(16,500)	(59,715)	—	(76,215)
Total Master Trust assets	$ 1,339,704,233	$ 7,130,930,713	$ —	$ 8,470,634,946

1 Underlying assets on the participant-directed brokerage account relate to mutual funds.
2 Other financial instruments include forwards, futures, options and swaps.

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The following table sets forth by level, within the fair value hierarchy, the Plan's and the Master Trust's assets and liabilities at fair value as of December 31, 2009.

	Investments at Fair Value as of December 31, 2009			
	Level 1	Level 2	Level 3	Total
Plan's investments, excluding interest in Master Trust:				
Company stocks	$ 3,132,632	$ —	$ -	$ 3,132,632
Participant-directed brokerage account[1]	568,232	—	—	568,232
Total Plan's investments	$ 3,700,864	$ —	$ —	$ 3,700,864
Master Trust's investments:				
Common stocks:				
International common stocks	$ 128,216,804	$ —	$ —	$ 128,216,804
Large-cap domestic common stocks	609,918,604	—	—	609,918,604
Mid-cap domestic common stocks	286,302,553	--	—	286,302,553
Small-cap domestic common stocks	45,106,802	—	—	45,106,802
Total common stocks	1,069,544,763	—	-	1,069,544,763
Investment contracts:				
Traditional GICs	—	894,567,953	—	894,567,953
Wrapper contracts	—	2,504,450	—	2,504,450
Underlying assets on synthetic GICs:				
Mutual funds	724,412,126	—	-	724,412,126
Commingled funds	—	3,871,352,144	—	3,871,352,144
Total investment contracts	724,412,126	4,768,424,547	—	5,492,836,673
Preferred stocks	5,662,597	—	—	5,662,597
Fixed income securities	—	28,258,005	—	28,258,005
Mutual funds	110,849,115	—	—	110,849,115
CCTs	—	1,217,694,419	—	1,217,694,419
Cash and short term investments	—	18,740,468	--	18,740,468
Total Trust investments assets	1,910,468,601	6,033,117,439	—	7,943,586,040
Other financial instruments[2]	(8,825)	226,586	--	217,761
Total Master Trust assets	$ 1,910,459,776	$ 6,033,344,025	$ —	$ 7,943,803,801

[1] Underlying assets on the participant-directed brokerage account relate to mutual funds.
[2] Other financial instruments include forwards, futures, and options.

For the year ended December 31, 2010, there were no significant transfers in or out of Levels 1, 2 or 3.

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NOTE 6 — CONOCOPHILLIPS STOCK

On September 28, 1998, DuPont announced that the Board of Directors had approved a plan to divest DuPont's 100% owned petroleum business, Conoco, Inc. On August 6, 1999, DuPont completed the planned divestiture through a tax-free split-off. DuPont exchanged its shares of Conoco, Inc. Class B common stock for shares of DuPont common stock. Plan participants had the option to exchange shares of DuPont common stock, which were held in their participant accounts in the DuPont Common Stock Fund. For each share of DuPont common stock exchanged, the participants received an appropriate number of shares of Conoco Class B common stock. Accordingly, the Conoco Class B Stock Fund was created as an investment fund of the Plan. No additional shares of Conoco Class B common stock may be purchased by Plan participants through payroll deductions, fund transfers, or the reinvestment of dividends. Dividends earned on Conoco Class B common stock are distributed pro rata to the investment options in participants' accounts based upon their current investment elections. On August 30, 2002, Conoco Stock Fund became ConocoPhillips Stock Fund. The balance on the Statement of Net Assets Available for Benefits within Company stocks related to ConocoPhillips stock was $274,282 and $199,167 at December 31, 2010 and 2009, respectively.

NOTE 7 — RELATED PARTY TRANSACTIONS

Certain Plan investments are shares of mutual funds and units of CCTs managed by Northern Trust and Bank of America, which also serve as trustees. In addition, the Plan offers DuPont common stock as an investment option. At December 31, 2010, the Plan held 80,471 shares of DuPont common stock valued at $4,013,932. At December 31, 2009, the Plan held 87,124 shares of DuPont common stock valued at $2,933,465. During the year ended December 31, 2010, the Plan purchased and sold approximately $935,000 and $1,048,000 of DuPont common stock, respectively. Transactions in these investments qualify as party-in-interest transactions which are exempt from the prohibited transaction rules of ERISA.

Also, the Stable Value Fund assets held by the Plan are managed by DCMC, under the terms of an investment management agreement between DCMC and the Company. DCMC hires additional investment managers to manage a portion of the fixed income assets backing synthetic GICs allocated to the Stable Value Fund. The amount of DCMC fees accrued and paid by the Stable Value fund was approximately $2,419,000 for the year ended December 31, 2010. DCMC fee amounts relate to the Master Trust and are allocated proportionately to the plans within the Master Trust based on each plan's interest to the total fair value of the Master Trust investment funds. These fees qualify as party-in-interest transactions, which are exempt from prohibited transaction rules of ERISA.

NOTE 8 — PLAN TERMINATION

Although it has not expressed any intent to do so, the Company has the right under the Plan to discontinue its contributions at any time and to terminate the Plan subject to the provisions of ERISA. In the event of Plan termination, participants would become 100% vested in all employer contribution.

NOTE 9 — TAX STATUS

The Plan is a qualified plan pursuant to Section 401(a) of the IRC and the related trust is exempt from federal taxation under Section 501(a) of the IRC. A favorable tax determination letter from the IRS dated September 3, 2003, covering the Plan and amendments through December 18, 2002, has been received by the Plan. The Plan has been amended since receiving the determination letter. In January 2011, the Plan submitted a request to renew the tax determination letter and is awaiting a reply from the IRS. The Plan administrator believes that the Plan is designed and is currently being operated in accordance with the applicable requirements of the IRC. Therefore, no provision has been made for federal income taxes in the Plan's financial statements.

Exhibit E

THRIFT AND SAVINGS PLAN FOR EMPLOYEES OF SENTINEL TRANSPORTATION, LLC

NOTES TO FINANCIAL STATEMENTS
AS OF DECEMBER 31, 2010 AND 2009, AND FOR THE YEAR ENDED DECEMBER 31, 2010

GAAP requires plan management to evaluate tax positions taken by the plan and recognize a tax liability if the plan has taken an uncertain position that more likely than not would not be sustained upon examination by the IRS. The Plan administrator has analyzed the tax positions taken by the plan and has concluded that as of December 31, 2010, there are no uncertain positions taken, or expected to be taken, that would require recognition of a liability or disclosure in the financial statements The Plan is subject to routine audits by taxing jurisdictions; however, there are currently no audits for any tax periods in progress.

NOTE 10 — RECONCILIATION OF FINANCIAL STATEMENTS TO FORM 5500

The following is a reconciliation of net assets available for benefits per the financial statements at December 31, 2010 and 2009 to the Form 5500:

	2010	2009
Net assets available for benefits per the financial statements	$ 45,882,240	$ 40,031,008
Adjustment from contract value to fair value for fully benefit-responsive investment contracts	1,068,977	476,210
Loan balances considered deemed distributions	(30,626)	(22,990)
Net assets available for benefits per the Form 5500	$ 46,920,591	$ 40,484,228

The following is a reconciliation of total additions per the financial statements for the year ended December 31, 2010 to total income per the Form 5500:

	2010
Total additions per the financial statements	$ 10,548,998
2010 adjustment from contract value to fair value for fully benefit-responsive investment contracts	1,068,977
2009 adjustment from contract value to fair value for fully benefit-responsive investment contracts	(476,210)
Total income per the Form 5500	$ 11,141,765

The following is a reconciliation of total deductions per the financial statements for the year ended December 31, 2010 to total expenses per the Form 5500:

	2010
Total deductions per the financial statements	$ 4,697,766
Current year cumulative deemed distributions	30,626
Prior year cumulative deemed distributions	(22,990)
Total expenses per the Form 5500	$ 4,705,402

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SUPPLEMENTAL SCHEDULE

Exhibit E

THRIFT AND SAVINGS PLAN FOR EMPLOYEES OF SENTINEL TRANSPORTATION, LLC

SCHEDULE OF ASSETS (HELD AT END OF YEAR) AS OF DECEMBER 31, 2010
ATTACHMENT TO FORM 5500, SCHEDULE H, PART IV, LINE I

(a)	(b) Identity of Issue	(c) Description of Investment	(d) Cost	(e) Current Value
*	DuPont Company Stock	Company stock	**	$ 4,013,932
	ConocoPhillips Stock	Company stock	**	274,282
*	Plan interest in the DuPont and Related Companies Defined Contribution Plan Master Trust	Master Trust	**	38,148,839
*	Participant-directed Brokerage Account	Brokerage account	**	1,010,628
*	Notes receivable from participants	4.25% to 9.25% - Maturing from March 2011 - September 2020	**	1,920,071
	Total Assets Held At End of Year			$ 45,367,752

* Party-in-interest
** Cost not required for participant directed investments

Exhibit E

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EXHIBIT INDEX

Exhibit Number	Description
23.1	Consent of Independent Registered Public Accounting Firm

Exhibit E

Table of Contents

SIGNATURE

The Plan Pursuant to the requirements of the Securities Exchange Act of 1934, the trustees (or other persons who administer the employee benefit plan) have duly caused this annual report to be signed on its behalf by the undersigned hereunto duly authorized

Thrift and Savings Plan for Employees of
Sentinel Transportation, LLC

/s/ Marilyn Shaw
Marilyn Shaw
Human Resources Manager

June 27, 2011

Exhibit E

EXHIBIT 23.1

CONSENT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

We hereby consent to the incorporation by reference in the Registration Statement on Form S-8 (No. 333-129494) of E. I. du Pont de Nemours and Company of our report dated June 27, 2011 relating to the financial statements and supplemental schedule of the Thrift and Savings Plan for Employees of Sentinel Transportation, LLC, which appears in this Form 11-K.

/s/ PricewaterhouseCoopers LLP

Philadelphia, Pennsylvania
June 27, 2011

Exhibit E

EXHIBIT F

HIGHLY CONFIDENTIAL EXHIBIT REDACTED

Exhibit F

EXHIBIT G

SIDLEY AUSTIN LLP
SIDLEY

SIDLEY AUSTIN LLP
1501 K STREET, N.W.
WASHINGTON, D.C. 20005
(202) 736 8000
(202) 736 8711 FAX

mjwarren@sidley.com
(202) 736-8996

BEIJING
BRUSSELS
CHICAGO
DALLAS
FRANKFURT
GENEVA
HONG KONG
LONDON
LOS ANGELES

NEW YORK
PALO ALTO
SAN FRANCISCO
SHANGHAI
SINGAPORE
SYDNEY
TOKYO
WASHINGTON, D.C.

FOUNDED 1866

October 24, 2011

By E-mail and First Class Mail

Jeffrey O. Moreno
Thompson Hine LLP
1920 N Street, N.W.
Suite 800
Washington, D.C. 20036-1600

Re: *E.I. du Pont de Nemours & Co. v. Norfolk Southern Railway Co.*, STB Docket No. NOR 42125

Dear Jeff:

Last week E.I. du Pont de Nemours & Company ("DuPont") served its Objections and Responses to Norfolk Southern Railway Company's ("NS's") Second Set of Interrogatories and Requests for Production of Documents ("DuPont Second Discovery Responses"). Several of the objections DuPont raised in its responses are not well-founded, and DuPont should withdraw them and produce the requested information. NS asks DuPont to withdraw these objections by Thursday, October 27; if DuPont does not do so NS will be forced to seek appropriate relief from the Board.[1]

First, DuPont's response to Interrogatory 37 indicates that it may be placing an inappropriate limitation on its production of information related to barge shipments. Interrogatory 37 is the result of an extended dialogue between the parties concerning DuPont's production of information about barge shipments of the Issue Commodities. NS's First Set of Discovery Requests asked DuPont to produce information on shipments of the issue

[1] Many of DuPont's Responses to NS's Second Set of Discovery Requests indicate that DuPont will produce additional responsive information or a "supplemental response." NS reserves its rights to seek additional relief from the Board if these supplemental responses are inadequate. *See* J. Moreno Letter to P. Hemmersbaugh at 2 (Mar. 14, 2011) (memorializing parties' agreement that motions to compel can be timely filed within 20 days after a party notifies the other party that its production of responsive data to a particular request is complete).

commodities by alternative transportation, including barge and truck shipments. DuPont indicated that it would produce responsive information. As the discovery period progressed, DuPont produced data on truck movements, but very little data on its barge movements. NS inquired about DuPont's incomplete production on July 22, 2011 and again on August 15, 2011, and DuPont responded that it had produced information for "all barge shipments controlled by DuPont." J. Tutrone Letter to M. Warren, at 1 (Sept. 9, 2011). NS responded by demonstrating that DuPont's production was <u>not</u> complete, because among other things it failed to include information on chlorine barge shipments that DuPont admitted to in a previous STB proceeding. *See* M. Warren Letter to J. Tutrone, at 2 (Sept. 19, 2011). NS further made clear that DuPont's apparent decision to only produce data for barge shipments that it deemed to be under its "control" was not reasonable, and that NS Interrogatory 37 was designed "[t]o remove any question" about DuPont's obligation to produce all barge shipment data within its possession, custody, or control. *Id.*

DuPont's response to Interrogatory 37 makes it impossible to understand what DuPont is producing and what it is refusing to produce. DuPont indicated on October 7 that it was "diligently searching for any shipment data for the 2006-2010 period that it has not already produced and will produce any additional data that it may discover." J. Tutrone Letter to M. Warren at 2 (Oct. 7, 2011). But its response to Interrogatory 37 indicates that DuPont may be limiting its discovery production to "barge shipments for which DuPont paid the freight."[2] DuPont Second Discovery Responses at 2. If so, that limitation is unjustified. Barge shipments to and from DuPont facilities do not become less relevant to DuPont's ability to use barges as an alternative to NS rail service because DuPont is not ultimately paying the freight for that barge shipment. For example, the relevance of a DuPont barge shipment of an issue commodity to a customer does not turn on whether that shipment was F.O.B. origin or F.O.B. destination. Please clarify whether DuPont is withholding or refusing to search for data responsive to Interrogatory 37 on the grounds that it relates to barge shipments for which DuPont did not pay the freight or that DuPont otherwise claims were not under its "control."

---

[2] DuPont's objection to Interrogatory 37's reference to "barge shipments DuPont deems to be under its 'control'" as "vague and ambiguous" is baffling. The letter accompanying NS's Second Set of Discovery Requests made clear that this language was included <u>because DuPont itself had indicated that it was only producing documents for "barge shipments controlled by DuPont</u>." M. Warren Letter to J. Tutrone, at 2 (Sept. 19, 2011). DuPont cannot cryptically claim that it is limiting its production to shipments it "controlled" and then object to that same language as being "vague and ambiguous." In any event, the point of the last sentence of Interrogatory 37 is that DuPont cannot avoid its obligation to produce responsive barge data on the theory that certain barge shipments to or from DuPont's facilities were not under DuPont's "control" or were not paid for by DuPont.

SIDLEY AUSTIN LLP
SIDLEY

Jeffrey O. Moreno
October 24, 2011
Page 3

Second, DuPont's refusal to provide complete answers to Interrogatories 43, 44, and 45 is not justified. These interrogatories respectively ask DuPont to state whether it contends that truck transportation, barge transportation, and transloading of the issue commodities is infeasible, impractical, or unwarranted because of the commodities' physical characteristics or hazardous nature or because of product quality concerns. These narrowly drawn interrogatories are appropriate contention interrogatories designed to sharpen the issues in dispute, and DuPont should answer them.

It is not clear what DuPont means when it says that it will provide responsive information "at the appropriate time." DuPont Second Discovery Responses at 17, 18 & 19. If DuPont means that it plans to provide full responses to these interrogatories in the coming weeks, that may be acceptable. But if what DuPont means is that it plans to ignore Interrogatories 43-45 and to address the subject of those interrogatories in its opening market dominance evidence, that is not acceptable. DuPont has brought an unprecedentedly broad case involving rates for shipments of twenty-six commodities over 160 lanes that traverse most of the states on NS's system. Asking DuPont to identify any issue commodities that it contends cannot be safely and efficiently trucked, barged, and transloaded is a reasonable use of discovery to narrow the issues in dispute in this complex litigation.[3] NS is not asking DuPont to disclose its market dominance evidence or to delve into the details of particular case lanes: NS is asking for DuPont's contentions as to whether the Issue Commodities are amenable to being trucked, barged, and transloaded. Please state whether DuPont will provide complete answers to these interrogatories.

Third, DuPont's objection to producing data in the possession of Sentinel Transportation, Inc., cannot stand. Sentinel was created as a wholly owned subsidiary of DuPont to operate DuPont's private truck fleet. *See* National Private Truck Council, Member Profile: Sentinel Transportation.[4] After DuPont's sale of Conoco, Sentinel was reformed as a joint venture with DuPont and Conoco as "controlling partners." *Id.* {{

[3] DuPont's reference to the supposed "plethora of information" it produced in discovery is a red herring. The focus of these interrogatories is whether DuPont contends that there are physical limitations or product quality concerns that generally inhibit alternative transportation. Documents that DuPont produces in discovery do not say anything about what DuPont is contending.

[4] http://www.nptc.org/index.php?option=com_content&task=view&id=227&Itemid=331.

}}[5] And the fact that "Sentinel . . . is a separate organization" is not a legitimate objection to discovery. *Id.* On the contrary, the Board has made clear that SAC discovery may properly reach a litigant's corporate affiliates. *See Seminole Electric Cooperative, Inc. v. CSX Transp., Inc.*, STB Docket No. NOR 42110 (served Feb. 17, 2009). Nor is there any merit to DuPont's suggestion that Sentinel information is not relevant. The capacity of DuPont's private truck fleet is highly relevant to market dominance issues, and DuPont's dubious suggestion that it does not have any control over the resources available to an entity {{ }} is an argument that DuPont can make in evidence if it wishes, not an argument for resisting discovery. Please state whether DuPont will withdraw its objection to producing Sentinel information.

* * *

To avoid unnecessary motion practice, NS asks DuPont to withdraw the objections discussed above by Thursday, October 27. If DuPont does not do so, NS will seek appropriate relief from the Board.

If you have any questions, please contact me.

Sincerely,

Matthew J. Warren

---

[5] References to information that DuPont designated Highly Confidential in its Second Discovery Responses is likewise designated Highly Confidential in this letter and is marked with double braces.

EXHIBIT H

THOMPSON HINE
ATLANTA CINCINNATI CLEVELAND COLUMBUS DAYTON NEW YORK WASHINGTON, D.C.

PUBLIC VERSION

October 27, 2011

By Email and Messenger

Matthew J. Warren
Sidley Austin LLP
1501 K Street, N.W.
Washington, D.C. 20005

Re: STB Docket No. NOR 42125, *E.I. du Pont de Nemours & Co. v. Norfolk Southern Railway Co.*

Dear Matthew:

This letter responds to your letter dated October 24, 2011 regarding the objections and responses of E.I. du Pont de Nemours and Company ("DuPont") to Norfolk Southern Railway Company's ("NS's") second set of discovery requests. We find that NS's threatened motion practice is unsupported and would be a waste of both the Board's resources as well as the resources of the parties in this proceeding.

With respect to the first part of your letter, DuPont is not withholding barge shipment data on grounds that it did not pay the freight. Nor is DuPont placing an inappropriate limitation on its production of information related to barge shipments. In DuPont's response to Interrogatory 37, DuPont cited to multiple documents that DuPont has produced and that contain barge shipment records. These documents demonstrate that DuPont has produced all responsive records of its barge shipments consistent with its discovery obligations. For instance, "Materials Received SAP.xls"[2] provides details on DuPont's receipt of 33 barge shipments of chlorine for which DuPont did not pay the freight. Clearly, DuPont is not withholding shipment data based on whether it paid the freight for or controlled such shipments. DuPont will not withdraw its valid objections to Interrogatory 37.

The only outstanding issue concerning barge data is the database issue that DuPont brought to NS's attention on October 7, 2011.[3] Without repeating that letter, DuPont has expressed that there is a slight chance that data exists in the archives of legacy systems that DuPont no longer uses. Thus, DuPont is going above and beyond its normal discovery obligation and is attempting to ascertain if such data, which is not readily accessible, exists and if it can be produced.

Regarding the second part of your letter, DuPont's responses and objections to NS's contention interrogatories are justified. Courts often defer responses to contention interrogatories unless the

[1] The portions of this letter that are enclosed in double braces (e g "{{ }}") are Highly Confidential pursuant to the Surface Transportation Board's protective order that applies to the above-captioned proceeding.
[2] This file is located on DD-HC-DVD-11.
[3] Letter from J. Tutrone to M. Warren of Oct. 7, 2011.

Exhibit H

proponent of such interrogatories demonstrates why such an immediate response is necessary.[4] NS has not articulated why an immediate response is necessary and why DuPont should dissect the theory of its lawsuit and articulate theories which may not be fully developed at this time.[5] As DuPont indicated in its response to Interrogatories 43-45, it has provided an abundance of information regarding the feasibility and practicality of trucking, barging, and transloading the Issue Commodities. Accordingly, NS is not prejudiced by DuPont's response and objections to date.

Further, your characterization of NS's contention interrogatories as merely requesting "whether the Issue Commodities are amenable to being trucked, barged, and transloaded" is at odds with the plain language of your interrogatories. Interrogatories 43-45 request DuPont's contentions about whether the truck and barge transportation and transloading of the Issue Commodities are "infeasible, impractical, or unwarranted." DuPont finds it disingenuous that NS is contending that such a request "is not asking DuPont to disclose its market dominance evidence" after having declared that "the core of the market dominance inquiry is 'whether there are feasible transportation alternatives that could be used for the issue traffic.'"[6] Moreover, Interrogatories 43-45 ask DuPont to "describe the particular commodity characteristics or product quality concerns that DuPont believes support that contention." The plain language of NS's contention interrogatories contradicts NS's assertion that they are not directing DuPont to "delve into the details." As limited by your letter of October 24, 2011, DuPont will provide a supplemental response to Interrogatories 43-45 by December 1, 2011 by providing a spreadsheet of the Issue Commodities that indicates for each Issue Commodity whether DuPont is contending that the Issue Commodity can or cannot be safely and efficiently trucked, barged, or transloaded.

Third, DuPont's objections to producing data in the possession of Sentinel Transportation, LLC ("Sentinel") are well-founded. Sentinel is a separate legal entity. DuPont is enclosing a disc, DD-HC-DVD-17, with a Highly Confidential copy of Sentinel's LLC agreement and refers NS to {{

}} Accordingly, DuPont does not withdraw its objection to producing documents in the possession, custody, and control of Sentinel. DuPont has produced responsive documents regarding its use of Sentinel consistent with its discovery objections.

---

[4] *M.A. Everett v. USAir Group, Inc.*, 165 F.R.D. 1, 4 (D.D.C. 1995).

[5] *See Storie v. United States*, 142 F.R.D. 317, 319 (E.D. Mo. 1991) (denying a motion to compel an answer to a contention interrogatory asking the plaintiff to detail specifically her contentions of negligence).

[6] N.S. Motion to Compel at 4 (Apr. 20, 2011).

THOMPSON HINE

Please contact me if you have any questions.

Best regards,

Jeffrey O. Moreno

Enclosure

EXHIBIT I

Our Company
Indonesia

Subsidiaries

[illegible]

Company Name	Organized [illegible] Of U.S. State Country
Agar Cross S A	Argentina
[illegible] Ltd	United Kingdom
[illegible]	Delaware
[illegible]	Mississippi
[illegible]	Bermuda
[illegible] Realty [illegible]	Delaware
[illegible] (Luxembourg) [illegible]	Luxembourg
[illegible]	Brazil
[illegible]	Brazil
DSPL [illegible]	[illegible]
DuPont [illegible] Automotive Coatings Company	Delaware
DuPont Australia [illegible]	Australia
DuPont (Korea) [illegible]	Korea
DuPont New Zealand [illegible]	New Zealand
DuPont (South America) [illegible]	Delaware
DuPont [illegible] Co., Ltd.	[illegible]
DuPont [illegible] UK Investments	United Kingdom
DuPont [illegible] Limited	United Kingdom
DuPont Agricultural [illegible]	[illegible]
DuPont Agricultural [illegible] Ltd., Shanghai	China
DuPont [illegible] S.A	Greece
DuPont [illegible] S.A	Argentina
DuPont Asia Pacific Ltd	Delaware
DuPont [illegible] GmbH	Austria
DuPont [illegible]	[illegible]
DuPont Capital Management Corporation	Delaware
DuPont Chemical and Energy Operations, Inc.	Delaware
DuPont China Holding Company, Ltd	China
DuPont China Limited	Hong Kong
DuPont [illegible]	Delaware
DuPont [illegible] SAS	France
DuPont [illegible] Pte Ltd	Singapore
DuPont [illegible] S.p.A	Delaware
DuPont [illegible] Center N.V.	Belgium
DuPont CZ [illegible]	Czech Republic
DuPont DACI [illegible]	Austria
DuPont Danmark ApS	Denmark
DuPont de Colombia S.A	Colombia
DuPont de Nemours [illegible] BVBA	Belgium
DuPont de Nemours [illegible] GmbH	Germany
DuPont de Nemours (France) S.A	France

Exhibit 1

DuPont de Nemours (France) S.A.S.	France
DuPont de Nemours (Luxembourg) SARL	Luxembourg
DuPont de Nemours (Nederland) B V.	Netherlands
DuPont de Nemours Development S.A.	Switzerland
DuPont de Nemours Groupe S.A.R.L.	France
DuPont de Nemours International S.A.	Switzerland
DuPont de Nemours International S.A. S. Africa Branch	South Africa
DuPont de Nemours Italiana S.r.l	Italy
DuPont Deutschland Holding GmbH & Co. KG	Germany
DuPont Diagnostics, Inc.	Delaware
DuPont Displays, Inc.	California
DuPont do Brasil S A.	Brazil
DuPont Performance Elastomers L.L.C.	Delaware
DuPont Eastern Europe BV	Netherlands
DuPont Elastomers Inc.	Delaware
DuPont Electronic Materials, Inc	Delaware
DuPont Electronics Microcircuits Industries, Ltd	Bermuda
DuPont Energy Company, LLC	Delaware
DuPont Engineering Products, S.A.R.L.	Luxembourg
DuPont Environmental Remediation Services, Inc.	Delaware
DuPont Far East, Inc.	Delaware
Dupont Far Eastern Petrochemicals Ltd.	China
DuPont Feedstocks Company	Delaware
DuPont Flandre Finance	France
DuPont Foreign Sales Corporation	Virgin Islands
DuPont Global Operations, Inc.	Delaware
DuPont Herberts Automotive Systems Services BVBA	Belgium
DuPont Holdco Spain I, S.L	Spain
DuPont Holdco Spain II, S.L	Spain
DuPont Holographics, Inc.	New York
DuPont Iberica, S.L.	Spain
DuPont India Ltd.	Delaware
DuPont International (Luxembourg) SCA.	Luxembourg
DuPont International Trading, Inc.	Delaware
DuPont Kabushiki Kaisha	Japan
DuPont KGA B.V.	Netherlands
DuPont Khimprom	Russia
DuPont Medical Products, Inc.	New York
DuPont Mexico S.A. de C.V.	Mexico
DuPont North America, Inc.	Delaware
DuPont NLco B.V.	The Netherlands
DuPont Operations (Luxembourg) SARL	Luxembourg
DuPont Operations Inc.	Delaware
DuPont Operations Worldwide, Inc.	Delaware
DuPont Orient Operations Ltd.	Delaware
DuPont Performance Coatings France SAS	France
DuPont Performance Coating Nederland BV	Netherlands
DuPont Performance Coatings (Thailand) Ltd	Thailand
DuPont Performance Coatings (U.K.) Ltd	United Kingdom
DuPont Performance Coatings Austria GmbH	Austria
DuPont Performance Coatings GmbH & Co KG	Germany
DuPont Performance Coatings Iberica, S.L	Spain
DuPont Performance Coatings Polska Spolka z.o.o.	Poland
DuPont Performance Coatings Pty. Ltd.	Australia
DuPont Performance Coatings Scandinavia AB	Sweden
DuPont Performance Coatings, Inc.	Delaware
DuPont Performance Coatings, Tintas e Vernizes, S A.	Portugal
DuPont Pharma, Inc	Delaware
DuPont Poland BV	Netherlands

Exhibit I

DuPont Poland Sp. z o.o	Poland
DuPont Polimeros Ltda	Brazil
DuPont Polyester Europe ApS	Denmark
DuPont Polymer Powder SARL	Switzerland
DuPont Powder Coatings (Malaysia) Sdn.	Malaysia
DuPont Powder Coatings Andina S.A	Colombia
DuPont Powder Coating Belgium N.V	Belgium
DuPont Powder Coatings France SAS	France
DuPont Powder Coatings Iberica, S.L.	Spain
DuPont Powder Coatings Saudia Co. Ltd.	Saudi Arabia
DuPont Powder Coatings Scandinavia AB	Sweden
DuPont Powder Coatings U.K. Ltd	United Kingdom
DuPont Powder Coatings USA, Inc	Delaware
DuPont Protective Apparel Marketing Company	Delaware
DuPont Pulverlack Deutschland GmbH & Co., KG	Germany
DuPont Quimica de Venezuela C.A	Venezuela
DuPont S.A. de C.V	Mexico
DuPont Scandinavia GmbH	Germany
DuPont Services B.V	Netherlands
DuPont Specialty Grains (d/b/a Optimum Quality Grains, LLC)	Delaware
DuPont Taiwan Ltd.	Taiwan
DuPont Textile Fibers, S.A	China
DuPont Textiles & Interiors (South America) Holdings LLC	Delaware
DuPont Textiles & Interiors Delaware, Inc	Delaware
DuPont Textiles & Interiors Holdings, Inc.	Delaware
DuPont Trading (Shanghai) Co., Ltd	China
DuPont Treasury Ltd.	United Kingdom
DuPont Vespel Parts and Shapes, Inc.	Pennsylvania
DuPont Wires Ltd	Taiwan
E.I. du Pont Canada Company	Canada
E.I. DuPont India Private Ltd.	India
EID Singapore, Inc	Delaware
Electronic Materials DuPont Dongguan Ltd.	China
Entek Corporation	Delaware
Entek Europe, Inc	Delaware
[illegible]	California
[illegible] Ltda	Brazil
Griffin Colombia S.A	Colombia
Griffin LLC	Delaware
[illegible] GmbH & Co. KG	Germany
Herberts America, Inc	Delaware
Herberts Mexico S.A. de C.V	Mexico
Herberts Plascon Pty. Ltd	Delaware
Hickory Holdings, Inc	Delaware
Holding DP S.A. de C.V.	Mexico
[illegible] Chemical Company	China
[illegible] Belgium EP Branch BVBA	Belgium
[illegible] de Mexico S.A. de C.V	Mexico
International Dioxcide, Inc	Delaware
[illegible] Box Corporation	Ohio
[illegible] Italia S.r.l	Italy
Pioneer Hi-Bred International, Inc	Iowa
Pitt-Consol Chemical Company	New Jersey
[illegible] Vision	California
PT DuPont Agricultural Products Indonesia	Indonesia
PT DuPont Powder Coatings Indonesia	Indonesia
[illegible] DuPont S.A	Brazil
[illegible] Transportation, LLC	Delaware
[illegible] Holdings LLC	Delaware

Exhibit I

Solae LLC (d.b.a. The Solae Company)	Missouri
Spies-Hecker, GmbH	Switzerland
Sporting Goods Properties Inc.	Delaware
Teodur B.V	Netherlands
UNIAX Corporation	California
Verdia, Inc.	Delaware
Vernplast S.A.	Switzerland

Subsidiaries not listed would not, if considered in the aggregate as a single subsidiary, constitute a significant subsidiary.

Exhibit I

EXHIBIT J

DUPONT E I DE NEMOURS & CO (DD)

10-K

Annual report pursuant to section 13 and 15(d)
Filed on 02/28/2006
Filed Period 12/31/2005

Exhibit J

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2005

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

FORM 10-K

Annual Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934

For the fiscal year ended December 31, 2005 **Commission file number 1-815**

E. I. DU PONT DE NEMOURS AND COMPANY

(Exact name of registrant as specified in its charter)

DELAWARE	**51-0014090**
(State or Other Jurisdiction of Incorporation or Organization)	**(I.R.S. Employer Identification No.)**

1007 Market Street
Wilmington, Delaware 19898
(Address of principal executive offices)

Registrant's telephone number, including area code: 302 774-1000
Securities registered pursuant to Section 12(b) of the Act
(Each class is registered on the New York Stock Exchange, Inc.):

Title of Each Class
Common Stock ($.30 par value) Preferred Stock (without par value-cumulative) $4.50 Series $3.50 Series

No securities are registered pursuant to Section 12(g) of the Act.

Indicate by check mark whether the registrant is a well-known seasoned issuer (as defined in Rule 405 of the Securities Act). Yes ☒ No ☐

Indicate by check mark whether the registrant is not required to file reports pursuant to Section 13 or Section 15(d) of the Act. Yes ☐ No ☒

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days. Yes ☒ No ☐

Indicate by check mark if disclosure of delinquent filers pursuant to Item 405 of Regulation S-K is not contained herein, and will not be contained, to the best of registrant's knowledge, in definitive proxy or information statements incorporated by reference in Part III of this Form 10-K or any amendment to this Form 10-K. ☐

Indicate by check mark whether the registrant is a large accelerated filer, an accelerated filer, or a non-accelerated filer. See definition of "accelerated filer and large accelerated filer" in Rule 12b-2 of the Exchange Act. Large accelerated filer ☒ Accelerated filer ☐ Non-accelerated filer ☐

Indicate by check mark whether the registrant is a shell company (as defined in Rule 12b-2 of the Act). Yes ☐ No ☒

The aggregate market value of voting stock held by nonaffiliates of the registrant (excludes outstanding shares beneficially owned by directors and officers and treasury shares) as of June 30, 2005, was approximately $42.0 billion.

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SUBSIDIARIES OF THE REGISTRANT

Set forth below are certain subsidiaries of
E. I. du Pont de Nemours and Company

Name	Organized Under Laws Of
Agar Cross S A	Argentina
Antec International Ltd	United Kingdom
Building Media, Inc	Delaware
ChemFirst Inc	Mississippi
Christiana Insurance, LLC	Vermont
Destination Realty Inc	Delaware
DPC (Luxembourg) SARL	Luxembourg
DPC S/A Brazil	Brazil
DPC South America	Brazil
DSRB Ltda	Brazil
DuPont 3F Fluorochemicals (Changshu) Company, Limited	China
DuPont-Kansai Automotive Coatings Company	Delaware
DuPont (Australia) Ltd	Australia
DuPont (Korea) Inc.	Korea
DuPont (New Zealand) Limited	New Zealand
DuPont (South America), Holdings LLC	Delaware
DuPont (Thailand) Co Ltd	Thailand
DuPont (U K) Investments	United Kingdom
DuPont (U.K) Limited	United Kingdom
DuPont Agricultural Caribe Industries, Ltd	Bermuda
DuPont Agricultural Chemicals Ltd , Shanghai	China
DuPont Agro Hellas S A	Greece
DuPont Argentina S A	Argentina
DuPont Asia Pacific, Limited	Delaware
DuPont Authentication Systems, LLC	Delaware
DuPont Beteiligungs GmbH	Austria
DuPont BVco BV	Netherlands
DuPont Capital Management Corporation	Delaware
DuPont Chemical and Energy Operations, Inc	Delaware
DuPont Chile S A	Chile
DuPont China Holding Company Ltd	China
DuPont China Limited	Hong Kong
DuPont China Limited (US)	Delaware
DuPont (China) Research & Development Company Limited	China
DuPont Coatings SAS	France
DuPont Company (Singapore) Pte Ltd	Singapore
DuPont Conid S p A	Delaware
DuPont Coordination Center N V	Belgium
DuPont CZ s r o	Czech Republic
DuPont DACI Beteiligungs GmbH	Austria
DuPont Danmark ApS	Denmark
DuPont de Colombia, S A	Colombia
DuPont de Nemours (Belgium) BVBA	Belgium

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DuPont de Nemours (Deutschland) GmbH	Germany
DuPont de Nemours (Flandre) S.A.	France
DuPont de Nemours (France) S.A.S.	France
DuPont de Nemours (Luxembourg) SARL	Luxembourg
DuPont de Nemours (Nederland) B.V.	Netherlands
DuPont de Nemours Development S.A.	Switzerland
DuPont de Nemours Groupe S.A.R.L.	France
DuPont de Nemours International S.A.	Switzerland
DuPont de Nemours International S.A.-S. Africa Branch	South Africa
DuPont de Nemours Italiana S.r.l.	Italy
DuPont Deutschland Holding Gmbh & Co. KG	Germany
DuPont Diagnostics, Inc.	Delaware
DuPont Displays, Inc.	California
DuPont Displays Solutions, Inc.	California
DuPont do Brasil S.A.	Brazil
DuPont Eastern Europe BV	Netherlands
DuPont Elastomers Inc.	Delaware
DuPont Electronics Microcircuits Industries, Ltd.	Bermuda
DuPont Energy Company, LLC	Delaware
DuPont Environmental Remediation Services Inc.	Delaware
DuPont Far East Inc.	Delaware
DuPont Farm Solutions Kabushiki Kaisha	Japan
DuPont Feedstocks Company	Delaware
DuPont Flandre Finance	France
DuPont Foreign Sales Corporation	Virgin Islands
DuPont Filaments—Americas, LLC	Delaware
DuPont Filaments—Europe B.V.	Netherlands
DuPont Global Operations, Inc.	Delaware
DuPont Herberts Automotive Systems Service BVBA	Belgium
DuPont de Nemours Holding SA	Switzerland
DuPont Holdco Spain I, SL	Spain
DuPont Holdco Spain II, SL	Spain
DuPont Holographics, Inc.	New York
DuPont Iberica, S.L.	Spain
DuPont India Limited	Delaware
DuPont International (Luxembourg) SCA	Luxembourg
DuPont International Trading, Inc.	Delaware
DuPont Kabushiki Kaisha	Japan
DuPont KGA B.V.	Netherlands
DuPont Khimprom	Russia
DuPont Malaysia SDN BHD	Malaysia
DuPont Medical Products, Inc.	New York
DuPont Mexico S.A. de C.V.	Mexico
DuPont-MRC Company, Ltd.	Japan
DuPont North America, Inc.	Delaware
DuPont NLco BV	Netherlands
DuPont Operations (Luxembourg) SARL	Luxembourg
DuPont Operations, Inc.	Delaware
DuPont Operations Worldwide, Inc.	Delaware
DuPont Orient Operations Limited	Delaware
DuPont Pakistan Operations (Pvt.) Limited	Pakistan

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DuPont Performance Coatings (Changchun) Company Limited	China
DuPont Performance Coating France SAS	France
DuPont Performance Coating Nederland BV	Netherlands
DuPont Performance Coatings Norge A/S	Norway
DuPont Performance Coatings (Thailand) Ltd	Thailand
DuPont Performance Coatings (U K) Ltd	United Kingdom
DuPont Performance Coatings Austria GmbH	Austria
DuPont Performance Coatings GmbH & Co KG	Germany
DuPont Performance Coatings Iberica, S L	Spain
DuPont Performance Coatings Polska Spolka z o o.	Poland
DuPont Performance Coatings Scandinavia AB	Sweden
DuPont Performance Coatings, Inc	Delaware
DuPont Performance Coatings, Tintas e Vernizes, S A	Portugal
DuPont Performance Coatings Venezuela, C A	Venezuela
DuPont Performance Elastomers L L C	Delaware
DuPont Pharma, Inc	Delaware
DuPont Poland BV	Netherlands
DuPont Poland Sp z o o	Poland
DuPont Polyester Europe Aps	Denmark
DuPont Polymer Powders SARL	Switzerland
DuPont Powder Coatings (Malaysia) Sdb	Malaysia
DuPont Powder Coatings Andina S A	Colombia
DuPont Powder Coatings Belgium N V	Netherlands
DuPont Powder Coatings France SAS	France
DuPont Powder Coatings Iberica S L	Spain
DuPont Powder Coatings Italia S r l	Italy
DuPont Powder Coatings Mexico S A de C V	Mexico
DuPont Powder Coatings Saudia Co Ltd	Saudi Arabia
DuPont Powder Coatings Scandinavia AB	Sweden
DuPont Powder Coatings U K Ltd	United Kingdom
DuPont Powder Coatings USA, Inc	Delaware
DuPont Protective Apparel Marketing Company	Delaware
DuPont Pulverlack Deutschland GmbH & Co KG	Germany
DuPont Quimica de Venezuela C A	Venezuela
DuPont Red Lion (Beijing) Coatings Co , Ltd	China
DuPont S A de C.V	Mexico
DuPont Scandinavia GmbH	Germany
DuPont Science (Luxembourg) SARL	Luxembourg
DuPont Services B V	Netherlands
DuPont (Shanghai) Sourcing Center Company, Ltd.	China
DuPont Surfaces (Guangzhou) Co , Ltd	China
DuPont Sverige AB	Sweden
DuPont Taiwan Ltd.	Taiwan
DuPont Textile Fibers, S A	China
DuPont Textiles & Interiors (South America) Holdings, LLC	Delaware
DuPont Textiles & Interiors Delaware, Inc	Delaware
DuPont Textiles & Interiors Holdings, Inc	Delaware
DuPont Trading (Shanghai) Co , Ltd	China
DuPont Treasury, Ltd.	United Kingdom
DuPont Turkiye Kimyasal Urunler Sanayi ve Ticaret Anonim Sirketi	Turkey
DuPont Vespel Parts and Shapes, Inc	Delaware

Exhibit J

DuPont Wirex Ltd.	Taiwan
DuPont Xingda Filaments Company Limited	China
E.I. du Pont Canada Company	Canada
E I. DuPont India Private Limited	India
EID Singapore, Inc.	Delaware
Electronic Materials DuPont Dongguan Ltd	China
Entek Corporation	Delaware
Entek Europe, Inc.	Delaware
Granirex	Canada
Griffin Brasil Ltda.	Brazil
Griffin Colombia S.A.	Colombia
Griffin, LLC	Delaware
Helmstedter Lack-und Chemische Fabrik GmbH & Co. KG	Germany
Herberts America Inc.	Delaware
Herberts Mexico S.A. de C.V.	Mexico
Herberts Plascon Pty Ltd.	South Africa
Hickory Holdings, Inc.	Delaware
Holding DP, S.A. de C.V.	Mexico
Huajia Chemical Company	China
Initiatives de Mexico, S.A. de C.V.	Mexico
International Dioxcide, Inc.	Delaware
Liqui-Box Canada, Inc.	Canada
Liqui-Box Corporation	Ohio
LB Europe Limited	United Kingdom
Liqui-Box Mexico, S.A. de C.V.	Mexico
Max Recubrimientos SA de CV	Mexico
OOO DuPont Russia LLC	Russia Federation
Optimum Quality Grains, (d.b.a. DuPont Specialty Grains, LLC)	Delaware
Permatex Italia S.r.l.	Italy
Pioneer Hi-Bred International, Inc.	Iowa
Pitt-Consol Chemical Company	New Jersey
PT DuPont Agricultural Products Indonesia	Indonesia
PT DuPont Powder Coatings Indonesia	Indonesia
Prepac SAS	France
Sentinel Transportation, LLC	Delaware
Solae LLC (d.b.a. The Solae Company)	Missouri
Spies Hecker, GmbH	Switzerland
Sporting Goods Properties Inc.	Delaware
Teodur B.V.	Netherlands
Uniax Corporation	California
Verdia, Inc.	Delaware
Verniplast S.A.	Switzerland

Subsidiaries not listed would not, if considered in the aggregate as a single subsidiary, constitute a significant subsidiary.

Exhibit J

EXHIBIT K

Sustainability

Sustainability by Example

Logistics and Distribution

DuPont Reduces Emissions and Fuel Usage through Sentinel Transportation

Sentinel Transportation, LLC, a joint venture of DuPont and ConocoPhillips, reduced NOx emissions by 4000 kg and CO2 emission by 3500 tons in 2007 thanks to state-of-the art emission reduction and fuel saving programs.

Sentinel, which provides much of DuPont's bulk truck transportation, has worked for the past several years to successfully implement multiple green initiatives which include limiting highway speeds to 60 mph, purchasing high efficiency truck engines, increasing payloads by reducing weight on trucks and trailers, using day cabs rather than sleeper cabs for one-day trips, specifying wide based tires on trucks and trailers and training drivers to maximize loads and optimize fuel efficiency. Over the next year, a new oil filtering system will be installed on all trucks to save DuPont over 2000 gallons of waste oil annually. Sentinel will generate an additional 5% increase in fuel efficiency and emission reductions with continual equipment replacements on trucks and trailers.

Sentinel was able to cut fuel costs and emissions in half for a key DuPont automotive customer. Delivery schedules were modified by sending a single truckload for two days of operation instead of dispatching two partially loaded trucks on separate days. For another customer, heavy pumps and compressors were removed from the Sentinel trucks and unloading equipment was installed at the customer's location. Delivery quantities per truck were increased while the number of loads was reduced by over 4[illegible]

To support long standing environmental goals, DuPont continually focuses on emission reductions for outbound shipment to customers. At our Parlin, NJ site we increased the payload by 5[illegible] and reduced the number of trucks by 55% through freight optimization. These results were essentially replicated at our Towanda, PA, facility, where we increased the average weight per truck 51%, reduced the number of trucks by 45%, and consumed 3[illegible] 000 fewer gallons of gas.

Reducing Emmissions from Ocean Transport

DuPont is the USA's seventh largest exporter and APL is one of DuPont's key ocean suppliers. It is the actions of ocean carriers such as APL which help to reduce the impacts from the ocean transport of freight to various global destinations. » More

Exhibit K

Exhibit K

EXHIBIT L

Tim Byrd
DuPont
Director, Global Logistics

Timothy Byrd was born and raised in Tennessee. He received a Bachelor's of Science degree in Chemical Engineering from Tennessee Technological University, and started his career with DuPont in 1985. During the past 25 years, Tim has held positions in manufacturing, technical and supply chain operations. Currently, he is Director for DuPont Global Logistics and Chairman for a DuPont joint venture, Sentinel Transportation, LLC. Immediately prior to his current role, Tim was Plant Manager at the DuPont Pencader performance polymers facility and Global Operations Leader for DuPont Vespel®. Tim has held various global leadership positions in DuPont for the past 11 years.

Tim assumed his current role as Director, Global Logistics effective February 2010.

EXHIBIT M

Tim Byrd

Chairman at Sentinel Transportation LLC

- **Director - Global Logistics at DuPont**
- **Chairman at Sentinel Transportation, LLC**

- Tennessee Technological University

77 connections

Tim Byrd's Experience

Director - Global Logistics

DuPont

Chairman

Sentinel Transportation, LLC

Tim Byrd's Education

Tennessee Technological University

Contact Tim for

getting back in touch

View Tim Byrd's full profile to

- See who you and **Tim Byrd** know in common
- Get introduced to **Tim Byrd**
- Contact **Tim Byrd** directly

View Full Profile

Not the Tim Byrd you were looking for? View more »

Exhibit M

EXHIBIT N

Media Center

News

[illegible]

DuPont Attorney Ramona Romero Confirmed as General Counsel of the USDA

[illegible] Romero

[illegible] the U.S. Senate [illegible] confirmed DuPont [illegible] Ramona Romero [illegible] General Counsel for the U.S. Department of Agriculture (USDA). [illegible]

In her most recent role at DuPont, Ramona provided [illegible] for the acquisition of [illegible] distribution, supply [illegible] and energy resources [illegible] and managed related [illegible] litigation. Since 2008, Ramona also served as General Counsel [illegible] LLC, a DuPont joint venture.

Throughout her legal career, Ramona has been a [illegible] the interests of [illegible] and women [illegible] programs at DuPont [illegible] partner law firms, as well as at the Hispanic National Bar Association, where she served [illegible] in 2008 and 2009. Ramona also has [illegible] distinguished honors, including *Hispanic Business Magazine* [illegible] in 2007 as one of the 100 most influential Hispanics in the U.S.

"We [illegible] Ramona [illegible] Senate [illegible] distinguished position [illegible] General Counsel for the USDA," [illegible] Tom Sager, DuPont senior vice president and general counsel.

"Ramona [illegible] lawyer [illegible] leader [illegible] respect [illegible] throughout the legal community. As a former president of the Hispanic National Bar Association, Ramona has been a true champion [illegible] diversity [illegible] the legal profession," Tom said. "Ramona is a [illegible] and experienced [illegible] the energy and intensity [illegible] around her because of her passion, [illegible]

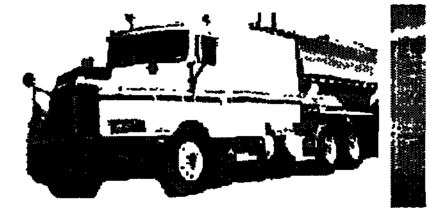
"Ramona will serve the American people with the highest degree of ethical standards [illegible] and integrity," Tom said.

Exhibit N

EXHIBIT O

SENTINEL TRANSPORTATION

"Standing Guard over Excellence"



Home

Current Employme Opportunit

Our Locatio

Employmei Informatio

Employee Informatioi Portal

Contact Us

Employee Information Portal

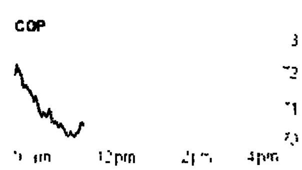
(Click on the links below for access to these Sites)

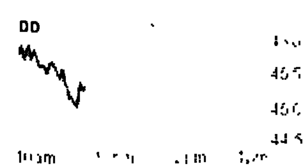
We want you to know® Aetna	Aetna Navigator: Sentinel's Primary Health Care Provider's Website
Merrill Lynch	Merrill Lynch Benefits Online: The Plan Administrator for Sentinel's Thrift and Savings Plan
Vision Benefits of America	Vision Benefits of America: Sentinel's Primary Vision Care Benefits Provider
MASTERY TECHNOLOGIES	Mastery Technologies: Sentinel's Online Training Website for Drivers and Supervisors
Sentinel Intranet Information System	Sentinel Intranet: Sentinel's Internal Network for Administrative and Supervisory Personnel. A Centralized Repository for Forms. Policies and Procedures

(Note: All of these site require individual Logins (Not controlled by Sentinel Transportation). Please contact the individual site providers for requirements and access)

SmartWay

NPTC National Private Truck C





Comments, questions and concerns regarding this website should be addressed to webmaster@sentineltrans.com

Exhibit O

EXHIBIT P

BULK TRANSPORTER

SENTINEL TRANSPORTATION FLOURISHES UNDER CLOSE DUPONT, CONOCO RELATIONSHIP

Apr 1, 2000 12 00 PM By Mary Davis

Sentinel Transportation LLC, Wilmington Delaware, has a long history with DuPont and Conoco going back to 1984 when the fleet was Conoco's private fleet At that time, the company operated for both Conoco and DuPont In 1996, Sentinel moved out of Conoco, and Sentinel Transportation Company, a wholly owned subsidiary of DuPont was formed But in 1998, DuPont decided to spin off Conoco

At that point, Sentinel's future was undecided Would the carrier be split up between DuPont and Conoco? Would the carrier be dissolved? What were the alternatives? To settle the dilemma, DuPont and Conoco conducted a study that resulted in a joint venture between the two companies so that the partnership could own Sentinel as a subsidiary fleet

The partnership, finalized in January 2000 is beneficial for all three entities The arrangement gives the carrier the opportunity to operate independently while retaining resources of the two major companies At the same time, DuPont and Conoco retained a company-tailored carrier dedicated to moving their products

"They saw the value in Sentinel and wanted to be involved in its continuation," says Jerry Carson, Sentinel president "We have a close relationship with DuPont and Conoco We have the added advantage that we are owned by them and have the opportunity to represent them Both companies use other carriers, but we are involved with the decisions they make that affect us "

Historically, almost 60% of the business comes from DuPont with most of the remainder generated by Conoco A small amount of the business, 2%-3%, comes from third parties

The carrier has 44 terminals with locations in Delaware, New Jersey, Michigan, Illinois West Virginia, Virginia, North Carolina, South Carolina, Georgia, Tennessee, Louisiana, Kentucky, Texas, Oklahoma, North Dakota, South Dakota, Colorado, Montana Utah Nevada and California

"There is one thing that I believe is unique about Sentinel " says Carson "As a single carrier it is as broad an operation as exists anywhere "

In the work it does for DuPont, the carrier hauls various chemicals including specialty chemicals, plastic pellets, acids, and corrosives, as well as cryogenics, and hazardous and nonhazardous wastes Products are transported to DuPont plants, from plant to plant, and to DuPont customers

The Conoco business includes crude oil transportation to pipelines and storage facilities Diesel and gasoline also are transported from storage facilities to retail stores and wholesale customers In addition, Sentinel hauls jet fuel, lube oil, and petroleum coke for Conoco

Vehicle Fleet Sentinel's fleet numbers almost 1,200 trailers, including about 650 tank trailers for chemicals and about 120 for petroleum products There are 65 dry bulk tank trailers, about 450 refrigerated and dry vans including a few rack vans used to transport industrial nylon on spools Dump trailers are available for hauling solid wastes and petroleum coke A few tank containers intermediate bulk containers (IBCs), and roll-off refuse boxes are transported

A majority of the trailers are dedicated to specific products and usually include short-distance hauling That doesn't mean there aren't some longhauls, but the percentage is somewhat lower says Carson

Having many different types of trailers and delivering many different types of hazardous materials reinforce the company's commitment to safety, an essential element for any carrier's success Because of the longtime emphasis on safety by DuPont and Conoco, Sentinel has adapted some of the procedures, training, and incentive programs to fit its own operation These programs have proven effective over the years for the parent companies, which brings an added reliability They are another example of the advantages Sentinel reaps through the connection to DuPont and Conoco

A program called "Safety Challenge" was introduced in late 1998 with the goal to eventually achieve zero accidents In order to determine its effectiveness, it was set up as a three-year test Any operating employee who completes one year without any kind of accident injury on the job, driving, product spillage, etc will receive a bonus based on gross earnings Each year the record is sustained, the reward increases another percent, up to a maximum of 5% If a preventable safety failure of any type does occur, the employee must move to the bottom of the ladder and begin again

Exhibit P

"We are seeing this reducing health and damage claims," says Carson. "And, it's a way of recognizing employees who are helping us reach the goal of zero accidents.

Safety Leadership Safety Leadership is a program developed in response to feedback from employees who expressed their desire to be directly involved in safety management. All supervisors and managers attend a 21D 2-day training seminar that is designed to incorporate employee participation in successfully managing safety.

"These training sessions are held periodically for new supervisors, part-time terminal dispatchers and supervisors, terminal employee trainers, and other key personnel nominated within the regions," says Rick Preston, safety, environmental, and regulatory affairs manager.

The goal is to raise employee awareness of hazards that may exist and could cause injury, collision, or product spill If there is a safety failure, an initial investigation is conducted to determine the cause, and the information is presented for peer group review. Typically, the peer group includes a supervisor, the employee involved, and one or two peers of the employee

"The first goal of the peer group is to uncover all physical, system, and human factors that contributed to the failure," says Preston. "Then ideas must be developed to prevent the contributing factor from happening again, avoiding a repeat of the failure."

In addressing prevention, the peer groups are encouraged to brainstorm for the most workable ideas. When the solutions apply to more than one terminal, they are distributed accordingly.

Employees are issued an in-depth safety manual that includes topics such as workplace and driving safety, occupational health issues, company policies, driver responsibilities, Department of Transportation (DOT) compliance, safety management systems, safety leadership, safety training, and compliance programs.

Another safety/incentive program is designed for drivers and mechanics the Hall of Fame/Million Miler Club. Drivers are inducted into the Hall of Fame/Million Miler Club upon completion of 15 years without a preventable collision or preventable lost work day case injury. Mechanics win the honor by completing 15 years without a preventable OSHA (Occupational Safety and Health Administration) recordable injury or preventable collision. Those who qualify are presented with $1,000.

Preston points out that about 78 employees are currently in the Hall of Fame since the program began A good deal of the success is credited to the training program that is in place and is continually reviewed and updated.

With a strong safety program and the stability of the company organization, Sentinel has not had as high a driver turnover problem as many other companies, Carson says Heestimates the rate at 10%-14% for the 550 drivers employed by the company. Another driver-friendly company policy is to keep tractors and tank trailers in excellent condition for high utilization so that drivers aren't left idle.

Despite a shallow applicant pool to draw from, driver applicants must meet specific guidelines to be considered. They must have three years' truck driving experience including six months similar to the Sentinel operation no more than three moving violations in the past three years, and no preventable collisions in 12 months. They must have a tank endorsement on the commercial driver license (CDL) and be at least 21 years old

New hires undergo classroom and on-road training that may last as long as six weeks. An inhouse-designed, computer-based training program was instituted by Conoco and has been in place for 15 years. It allows drivers (and other employees) to take the interactive training at their own pace and at a time when it is convenient for them. Subjects are presented in small lessons that can usually be completed in less than an hour.

After a driver logs on, the personal list of required modules appears on the screen. The required subjects can be studied one at a time to build a knowledge base before taking a quiz. The computer records when the steps are successfully completed and marks the outcome on the employee's personal menu. The program tracks training dates and indicates on the personal module list when refresher training is required.

Employees who handle specialized products require regular retraining and recertification. Training subjects includes company orientation and policies, DOT regulations, defensive driving, and hazardous materials handling. Drivers are cross trained for all of the trailers in the fleet so they can eventually haul all products overseen by the terminal where they are assigned.

Driver Fatigue In addition to the technical training are programs that address driver fatigue. Longhaul drivers are required to complete a four-hour training program, Driving in the Awake Lane, developed by Safety and Fatigue Consultants International.

"We found them to have an excellent program with a multisegment video tape and complete instructor's guide and script, as well as two student workbooks, pre-test, and post-tests," says Preston. "The program includes a medical evaluation sheet for drivers and their families to help determine if the driver may be suffering from any sleep disorders."

Five senior operations managers and Preston were qualified to present the program, and all longhaul drivers completed the program in 1998.

"We will probably repeat again this year, or early 2001, shooting for a two-to-three-year cycle," he says

For local and shorthaul drivers, a two-hour program, The Alert Driver, was implemented The program is produced jointly by the American Trucking Associations and the Federal Motor Carrier Safety Administration. It includes a single segment videotape and driver workbooks

"This program is not as technical, so we developed our own script for supervisors to use as they present the training," says Preston. "The script leads the supervisor and the driver group through an interactive session at the end of each training where they jointly identify the

Exhibit P

schedules or conditions in each terminal that are areas of high fatigue exposure Then the group develops ideas to make schedule changes and help drivers, and their families, manage fatigue in order to prevent serious accidents "

Drivers and some spouses were included in the training sessions

"We are trying a shift-worker newsletter we recently found on the Internet from a supplier, Circadian Information, www circadian com " he says "The newsletter includes articles managing life for shift workers and the associated fatigue dangers We are trying it with drivers at a few of our terminals to see if they feel the letter helps keep fatigue management tips in mind "

Safety Meetings Sentinel requires each terminal to conduct a minimum of one safety meeting per quarter "Many terminals have more frequent meetings as required to meet the needs of each group," says Preston "These meetings will include training and refresher training on specific hazards of the work at that terminal, as well as general safety issues "

Sentinel chose Solomon IV for Windows from Solomon Software Inc as the primary accounting platform Also part of the program is a system used by the human resource department developed by FLX Corporation Other programs customized for Sentinel were developed by ClearView Software Inc

"By implementing the Solomon system and automating remote processing and approval with centralized check fulfillment, Sentinel significantly cut down the number of people tracking fleet accounting," says James Ingersoll, chief financial officer

Since installing the new system, the company has cut total administrative support in half The savings come from the elimination of the double data entry, data validation at the source, mainframe maintenance, and other business process streamlining The applications give Sentinel better control of costs Responsibility and accountability for source information is now with the people who generate the information

The terminals are responsible for inputting information correctly, authorizing payments, and managing relationships with vendors, who supply the terminals with everything from general supplies to contract and maintenance services, tires, leases, and more

The customized system makes all of this possible, ensuring that the outlying terminals have the data they need to communicate accurately and effectively with vendors while payments are being processed and managed centrally Sentinel finds that it is much more efficient to manage vendor relationships at the terminal level The remote function gives terminal personnel the freedom they require to maintain important alliances

In addition, there is a long-range plan to add Sentinel's companywide operations to an intranet Custom web tools will allow the outlying terminals to transmit data to Sentinel headquarters via the Internet

Maintenance Technology In conjunction with the accounting program is a maintenance program now underway at the Parkersburg, West Virginia, terminal where operations are dedicated to DuPont The new three-bay shop introduces in-house maintenance at the terminal where before, all vehicle maintenance had been outsourced Sentinel maintenance arrangements vary by terminal, some providing in-house service while others send vehicles to outside repair shops Some of the terminals with in-house maintenance are introducing computerized maintenance programs

Decisions for outsourcing or implementing in-house maintenance are based on the individual needs of the terminal and what resources are available in nearby commercial maintenance facilities

At Parkersburg, the Canadian Micro Systems (CMS) program, Maintain, was adapted to fit the carrier's needs, says Quentin Willey terminal manager

"The program has a flexible database that we have been able to customize for our power units and trailers," he says. "We have set up maintenance schedules for each vehicle "

Although entering the data to get the program running was tedious, the results have been well worth the effort, Willey says Parts inventory is controlled, and a comprehensive history of each vehicle is always available

Not only does the program handle specific maintenance data, it allows managers to compare vehicle performance and use that information for making decisions when new vehicles are acquired Although Sentinel's tractors are almost identical in specification, performance varies, Willey says Before the computer program was in place, tracking each tractor for individual and minute details was almost impossible Now performance can be evaluated on a one-on-one basis

Each time mechanics complete a work order on one of the 20 power units or 100 trailers, they enter the information via a computer terminal set up in the maintenance office "We decided to keep the computer in the office rather than on the maintenance floor to protect it," he says

The shop supervisor doublechecks mechanic entries and then confirms that the work order has been completed A parts reorder report is provided three times a week, and a weekly report is generated by the shop foreman for review by the terminal manager

The computer program handles specific queries about vehicles For example, if an alternator failure has occurred on a tractor, information can be retrieved that will show if it failed before and how often With the data, managers can determine causes for failures and seek ways to head them off for the future

One way failures are avoided is through the Sentinel preventive maintenance (PM) procedures Trailers have scheduled PMs every 90 days In addition, trailers are routinely checked after every product unloading "As a result of this schedule our out-of-service rate has been

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reduced considerably," Willey noted. DOT inspections are conducted annually as required, but trailers that are used to transport certain hazardous materials are scheduled for additional inspections every six months

Tractors receive minor service every 15,000 miles and a full service at 30,000. Oil is analyzed at least once a year after a base line has been established As tractors acquire more miles, the test may be run twice a year The 30,000-mile oil drain cycle is a result of using Conoco's Power D 15W40 motor oil, he says.

Tractor Specifications Sentinel Transportation uses three basic Kenworth chassis configurations for power unit selections, says Orville White, vice-president, equipment manager. These are the 225-inch wheelbase Kenworth T600B Aerocab with 70-inch integral sleeper berth, 190-inch wheelbase Kenworth T600B daycab, and the 190-inch wheelbase Kenworth T800 daycab. The T800 is configured so that it can be used to haul gasoline or operated in other types of daycab operation. It is also used in offroad crude oil operations.

"The PTO application fits the various operations," says White. "The only other change is on the T800 daycab where a Holland Kompensator fifthwheel is installed for crude oil service."

As primarily a bulk carrier, Sentinel is weight sensitive and currently uses the Cummins M11 and the new Cummins ISM engines. The use of lighter-weight engines saves approximately 800 pounds over the steering axle, and makes it possible to move the fuel tanks and batteries closer to the front, allowing higher payload configurations.

"Although the fleet is primarily Cummins powered, we are testing 21 Caterpillar C10 and C12 engines to determine any possible power, fuel, and increased operating efficiencies," White says.

All daycabs have engines set for 330 horsepower at 1800. When used in an application exceeding 80,000 pounds, power is increased approximately 20 horsepower for every additional 10,000-pound increase in gross combination vehicle weight (GCVW) All over-the-road Kenworth T600B Aerocab sleeper tractors operate with either 350- or 370-hp engines, with the 370 being used where the terminal operating the unit is pulling higher profile equipment than a standard tank trailer.

Most power units are specified with Eaton's nine-speed RTX-14709H overdrive transmission. Those pulling over 100,000 GCVW are specified with Eaton's 18-speed transmission to allow more gear selections on grades and to allow more flexibility in mountainous terrain. All units have Eaton's DS404 rear axle with a 4.33 ratio The transmission and rear axle combination help optimize fuel economy in conjunction with the company's maximum operating speed limit of 60 mph.

"Several of our over-the-road fleets that operate basic tank equipment consistently return a fuel economy exceeding eight miles per gallon using the Cummins M11 and ISM engines," White notes.

All power units are specified with Meritor WABCO antilocking braking system (ABS). The addition of the traction control feature has allowed Sentinel to specify only the DS404 drive axle for all power units, including off-road crude oil operations operating at 115,000 plus pounds.

All of the units use the Kenworth Airglide 200 suspension. Air ride cabs have been selected since last year. An additional weight savings of approximately 120 pounds is achieved in the T800 daycab and T600B Aerocab sleeper units used in highway applications by using Delphi composite front springs.

"One additional benefit is that the composite spring has increased steering tire life from 100,000 miles to over 180,000 on the Michelin XZA+2 steering axle tires," White says The T800 can be configured for either a tractor or a straight truck operation by simply lengthening the wheelbase from the standard 190-inch to 230- to 245-inch wheel base to accommodate tank or van body.

The T800 daycab, when used in crude oil operations, also is built with an AMOT shut down system to prevent engine runaway during loading and unloading of crude oil products that produce high vapor problems.

Fleet Trailers Sentinel Transportation operates 10 types of trailers. These include 60 MC306 and DOT406 tanks for fuels and lube oils, 50 MC307 and DOT407 aluminum tanks for crude oil, 10 MC307 and DOT407 uninsulated stainless steel trailers for liquid waste, 450 MC307 and DOT407 stainless steel insulated trailers for general chemical, and 30 MC312 and DOT412 carbon steel rubber-lined trailers for acids Also in the fleet are two MC312 and DOT412 carbon steel Derakane lined tank trailers, and 25 MC312 and DOT412 stainless steel trailers for acids. Another 270 trailers (20 for Sentinel and 250 for DuPont) are used for propane and refrigerant gases. Sentinel also has 80 vacuum-pneumatic dry bulkers used by DuPont.

In addition, Sentinel operates 25 refrigerated trailers, 450 dry vans, nine flatbeds, 35 end dumps, and 10 roll-off chassis.

Crude oil trailers are equipped with Roper loading and unloading pumps that operate in conjunction with a Thermoflow hydrapac unit mounted on the tractor Speed control is maintained via a variable speed control valve.

"This system is designed in conjunction with the Garnett overfill system that disengages the hydraulic system through a bypass valve," says White "This helps avoid overfills. The hydraulic system also is sensitive enough to disengage (bypass) in the event a closed valve is pumped against. The sudden hydraulic pressure surge causes the system to bypass before there is any hose damage or hose to couple separation "

The Brenner DOT407 stainless steel tank trailers are built with a full vapor recovery system that can be utilized for closed-loop loading. The vapor recovery is accessible in both the manway area, as well as at the curbside rear of the trailer. This configuration allows closed-loop operation without the driver or operator getting on top of the trailer.

"All carbon steel DOT412 trailers are designed and built with full closed-loop loading capabilities," White adds. "These trailers use the same basic specification as the stainless steel DOT412 trailers with the exception of capacity The carbon steel trailers typically are used for

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hydrochloric acid and are rubber lined They have a capacity of 5,000 US gallons "

The stainless steel DOT412 trailers have a capacity of 3,800 US gallons and are typically used in sulfuric acid service White says

The planning that goes into vehicle selection at Sentinel is just one more example of the company's efforts to continue offering its owners excellent service Most of Sentinel's managers have been employed by DuPont or Conoco, or they have worked for Sentinel in conjunction with the two companies That experience, coupled with the sophisticated training and advanced technology that has come with the major companies, bodes well for the future relationship

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